Iowa Department of Natural Resources Title V Operating Permit

Name of Permitted Facility: American Packaging Corporation

103 West Broad Street **Facility Location:** Story City, Iowa 50248

Air Quality Operating Permit Number: 00-TV-058R1

Expiration Date: March 9, 2011

EIQ Number: 92-0209

Facility File Number: 85-03-003

Responsible Official

Ray Graham **Operations Manager** 103 West Broad Street, Story City, IA 50248 (515) 733-1400

Permit Contact Person for the Facility

Travis Perry Plant Engineer 103 West Broad Street, Story City, IA 50248 (515) 733-1400

This permit is issued in accordance with 567 Iowa Administrative Code Chapter 22, and is issued subject to the terms and conditions contained in this permit.

For the Director of the Department of Natural Resources

Douglas A. Campbell, Supervisor of Air Operating Permits Section

Date

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Abbreviations

acfm	actual cubic feet per minute
BACT	Best Available Control Technology
CFR	Code of Federal Regulation
	.emissions inventory questionnaire
°F	
	Flexographic Printing and Laminating
gr/dscf	grains per dry standard cubic foot
gr/100 cf	grains per one hundred cubic feet
ĪAC	Iowa Administrative Code
IDNR	Iowa Department of Natural Resources
kW	
lb/hr	pounds per hour
lb/MMBtu	pounds per million British thermal units
lbs/mo	pounds per month
MVAC	.motor vehicle air conditioner
N/A	Not Applicable
	new source performance standard
ppmv	.parts per million by volume
PPD	Preformed Products Division
PSD	.Prevention of Significant Deterioration
scfm	standard cubic feet per minute
SIC	standard industrial classification code
tpy	tons per year
USEPA	United States Environmental Protection Agency
Pollutants	
PM	.particulate matter
	particulate matter ten microns or less in diameter
SO ₂	
NO _x	
	.volatile organic compound
CO	
CO ₂	
HAPs	hazardous air pollutants

I. Facility Description and Equipment List

Facility Name: American Packaging Corporation

Permit Number: 00-TV-058R1

Facility Description: Flexographic Printing & Lamination, and Manufacturing of Preformed

Products (primarily consumer product packaging, such as microwave

popcorn bags) - SIC 2759

Equipment List (*)

Emission Point Number	Associated Emission Unit Number	Associated Emission Unit Description	Iowa DNR Construction Permit
EP-D	CE-01D	Afterburner Dryer	04-A-589-P
EP-DB	CE-02D	Afterburner Dryer	04-A-588-P
	FLX51.286	Flexographic Press No. 5	
	FLX51.286-D1	Flexographic Press No. 5 Deck Dryer	
	FLX51.286-D2	Flexographic Press No. 5 Tunnel Dryer	
	LAM03	Adhesive Laminator No. 3	
	LAM03-D	Adhesive Laminator No. 3 Dryer	
	RG03	Rotogravure No. 3	
	RG03-D	Rotogravure No. 3 Dryer	
	FLX51.286a	Flexographic Press No. 6	
	FLX51.286a-D1	Flexographic Press No. 6 Deck Dryer	
	FLX51.286a-D2	Flexographic Press No. 6 Tunnel Dryer	
	LAM04	Adhesive Laminator No. 4	
	LAM04-D	Adhesive Laminator No. 4 Dryer	
	RG04	Rotogravure No. 4	
	RG04-D	Rotogravure No. 4 Dryer	
	LAM05	Adhesive Laminator No. 5	
	LAM05-D	Adhesive Laminator No. 5 Dryer	
	CT08	Corona Treater No. 8	
	CT09	Corona Treater No. 9	
	CT10	Corona Treater No. 10	
	CT11	Corona Treater No. 11	
	CT12	Corona Treater No. 12	
	FLX7660	Flexographic Press No. 2	
	FLX7660-D	Flexographic Press No. 2 Dryer	
	LAM01	Adhesive Laminator No. 1	
	LAM01-D	Adhesive Laminator No. 1 Dryer	
	FLX7719	Vision Flexographic Press	
	FLX7719-D	Vision Flexographic Press Dryer	

Equipment List (*) (Continued)

Emission Point Number	Associated Emission Unit Number	Associated Emission Unit Description	Iowa DNR Construction Permit
EP-D	FLX41.569	W & H Flexographic Press	04-A-589-P
EP-DB	FLX41.569-D	W & H Flexographic Press Dryer	04-A-588-P
(Cont'd)	RG01	Rotogravure Unit No. 1	(Cont'd)
	RG01-D	Rotogravure Unit No. 1 Dryer	
	RG02	Rotogravure Unit No. 2	
	RG02-D	Rotogravure Unit No. 2 Dryer	
	RENZ	Renzmann Parts Washer	
EP-D1	FLX7660-A	Flexographic Press No. 2	99-A-351-S2
LI DI	FLX7660-D	Flexographic Press No. 2 Dryer)) II 331 B2
EP-D2	LAM01-A	Adhesive Laminator No. 1	96-A-559-S4
	LAM01-D	Adhesive Laminator No. 1 Dryer	7 - 1 - 1 - 1 - 1
EP-D3	FLX7719-A	Vision Flexographic Press	97-A-429-S3
	FLX7719-D	Vision Flexographic Press Dryer	7, 11, 12, 13
EP-D4	RG01-A	Rotogravure Unit No. 1	99-A-346-S2
	RG01-D	Rotogravure Unit No. 1 Dryer	77 11 0 10 02
EP-D5	RG02-A	Rotogravure Unit No. 2	99-A-347-S2
	RG02-D	Rotogravure Unit No. 2 Dryer	77 11 0 17 22
EP-D6	FLX41.569-A	W&H Flexographic Press	97-A-430-S4
21 20	FLX41.569-D	W&H Flexographic Press Dryer	77 11 100 21
	KOP124	KOP Bag Machine No. 24	
EP-E	KOP127	KOP Bag Machine No. 27	_
(Vent	KOP128	KOP Bag Machine No. 28	
Internally)	KOS401	KOS No. 1	94-A-601-S6
internary)	KSL001	KSL No. 1	
	MBD501	MBD No. 501	
EP-FAC	FAC	Facility Cleanup Solvent Use	
EP-FPL	FP&L	FP&L Division Cleanup Solvent Use	98-A-870-S2
EP-RENZ RENZROOM		Renzmann Parts Washer	70-A-070-32
EP-H1	CT01	Corona Treater No. 1	00-A-784-S1
EP-H2	CT02	Corona Treater No. 2 00-A	
ЕР-Н3	CT03	Corona Treater No. 3	00-A-786-S1
EP-H4	EP-H4 CT04 Corona Treater No. 4		00-A-787-S1
EP-H5	EP-H5 CT05 Corona Treater No. 5		00-A-788-S1
EP-H6			00-A-789-S4
EP-H7	P-H7 CT07 Corona Treater No. 7		01-A-188-S2
EP-L	LAM02	Laminator No. 2 – Mist Eliminator	01-A-189-S2

^(*) Note: Equipment enclosed in double borders is grouped in a table in the Emission Point-Specific Conditions section of the permit.

Insignificant Equipment List

Insignificant Emission	Insignificant Emission Unit Description
Unit Number	
IA-01	Still for Renzmann Unit
IA-02	Sandblasting
IA-05	Trim Collection
IA-06	Material Dispensing Unit
	Space Heaters (Natural Gas)
	(21) units @ 0.125 MMBtu/hr each
IA-09	(3) units @ 0.165 MMBtu/hr each
IA-03	(2) units @ 0.25 MMBtu/hr each
	(1) unit @ 1.25 MMBtu/hr
	(2) units @ 5.0 MMBtu/hr each
IA-11	Outdoor Storage Tanks (6,000 gallons each)
IA-12	Indoor Storage Tanks (1,000 gallons and 470 gallons)
IA-13	Flexo Wash Machine
IA-14	Fugitive emissions from unpaved roads
IA-15	Pouch Machines
IA 16	Natural Gas Boiler (2.34 MMBtu/hr) which supplies steam to
IA-16	W&H Flexographic Press Dryer (EU FLX41.569-D)

II. Plant-Wide Conditions

Facility Name: American Packaging Corporation

Permit Number: 00-TV-058R1

Permit conditions are established in accord with 567 Iowa Administrative Code rule 22.108

Permit Duration

The term of this permit is: Five (5) years

Commencing on: March 10, 2006

Ending on: March 9, 2011

Amendments, modifications and reopenings of the permit shall be obtained in accordance with 567 Iowa Administrative Code rules 22.110 - 22.114. Permits may be suspended, terminated, or revoked as specified in 567 Iowa Administrative Code Rules 22.115.

Emission Limits

Unless specified otherwise in the Source Specific Conditions, the following limitations and supporting regulations apply to all emission points at this plant:

Opacity (visible emissions): 40% opacity

Authority for Requirement: 567 IAC 23.3(2)"d"

Sulfur Dioxide (SO₂): 500 parts per million by volume

Authority for Requirement: 567 IAC 23.3(3)"e"

Particulate Matter (state enforceable only)¹:

No person shall cause or allow the emission of particulate matter from any source in excess of the emission standards specified in this chapter, except as provided in 567 – Chapter 24. For sources constructed, modified or reconstructed after July 21, 1999, the emission of particulate matter from any process shall not exceed an emission standard of 0.1 grain per dry standard cubic foot of exhaust gas, except as provided in 567 – 21.2(455B), 23.1(455B), 23.4(455B) and 567 – Chapter 24.

For sources constructed, modified or reconstructed prior to July 21, 1999, the emission of particulate matter from any process shall not exceed the amount determined from Table I, or amount specified in a permit if based on an emission standard of 0.1 grain per standard cubic foot of exhaust gas or established from standards provided in 23.1(455B) and 23.4(455B). Authority for Requirement: 567 IAC 23.3(2)"a" (as revised 7/21/1999)

Pending approval into Iowa's State Implementation Plan (SIP), paragraph 567 IAC 23.3(2)"a" (as revised 7/21/1999) is considered state enforceable only.

Particulate Matter ²:

The emission of particulate matter from any process shall not exceed the amount determined from Table I, except as provided in 567 — 21.2(455B), 23.1(455B), 23.4(455B) and 567 — Chapter 24. If the director determines that a process complying with the emission rates specified in Table I is causing or will cause air pollution in a specific area of the state, an emission standard of 0.1 grain per standard cubic foot of exhaust gas may be imposed. Authority for Requirement: 567 IAC 23.3(2)"a" (prior to 7/21/1999)

<u>Fugitive Dust:</u> Attainment and Unclassified Areas - No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, with the exception of farming operations or dust generated by ordinary travel on unpaved public roads, without taking reasonable precautions to prevent particulate matter in quantities sufficient to create a nuisance, as defined in Iowa Code section 657.1, from becoming airborne. All persons, with the above exceptions, shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate. The highway authority shall be responsible for taking corrective action in those cases where said authority has received complaints of or has actual knowledge of dust conditions which require abatement pursuant to this subrule. Reasonable precautions may include, but not limited to, the following procedures.

- 1. Use, where practical, of water or chemicals for control of dusts in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land.
- 2. Application of suitable materials, such as but not limited to asphalt, oil, water or chemicals on unpaved roads, material stockpiles, race tracks and other surfaces which can give rise to airborne dusts.
- 3. Installation and use of containment or control equipment, to enclose or otherwise limit the emissions resulting from the handling and transfer of dusty materials, such as but not limited to grain, fertilizers or limestone.
- 4. Covering at all times when in motion, open-bodied vehicles transporting materials likely to give rise to airborne dusts.
- 5. Prompt removal of earth or other material from paved streets or to which earth or other material has been transported by trucking or earth-moving equipment, erosion by water or other means.

Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan

The owner/operator shall comply with the applicable requirements listed below. The compliance status is based on information provided by the applicant.

Unless otherwise noted in Section III of this permit, American Packaging Corporation is in compliance with all applicable requirements and shall continue to comply with all such

American Packaging 8 00-TV-058R1, 3/10/06

Paragraph 567 IAC 23.3(2)"a" (prior to 7/21/1999) is the general particulate matter emission standard currently in the Iowa SIP.

requirements. For those applicable requirements which become effective during the permit term, American Packaging Corporation shall comply with such requirements in a timely manner.

Authority for Requirement: 567 IAC 22.108(15)

40 CFR 63 Subpart KK--National Emission Standards for the Printing and Publishing Industry

The permittee shall comply with all applicable requirements from 40 CFR Part 63, Subpart KK and 40 CFR Part 63, Subpart A.

Applicability (Area Source Status)

- A. Pursuant to 567 IAC 23.1(4)"ak", as referenced in 40 CFR 63.820(a)(2), the permittee has committed to:
 - (i). Use less than 9.1 Mg (10 tons) per each rolling 12-month period of each HAP at the facility, including materials used for source categories or purposes other than printing and publishing, and
 - (ii). Use less than 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories other than printing and publishing.
- B. Pursuant to 567 IAC 23.1(4)"ak", as referenced in 40 CFR 63.820(a)(3), the permittee is considered an area source, and is subject only to the provisions of 40 CFR 63.829(d) [Recordkeeping requirements] and 40 CFR 63.830(b)(1) [Reporting requirements] of this subpart.
- C. Pursuant to 567 IAC 23.1(4)"ak", as referenced in 40 CFR 63.820(a)(4), for the purposes of complying with 40 CFR 63.820(a)(2) the permittee may exclude material used in routine janitorial or facility grounds maintenance, personal uses by employees or other persons, the use of products for the purpose of maintaining electric, propane, gasoline and diesel powered motor vehicles operated by the facility, and the use of HAP contained in intake water (used for processing or noncontact cooling) or intake air (used either as compressed air or for combustion).
- D. Pursuant to 567 IAC 23.1(4)"ak", as referenced in 40 CFR 63.820(a)(5), each facility for which the owner or operator commits to the conditions in 40 CFR 63.820(a)(2) to become an area source, but subsequently exceeds either of the thresholds in 40 CFR 63.820(a)(2) for any rolling 12-month period (without first obtaining and complying with other limits that keep its potential to emit HAP below major source levels), shall be considered in violation of its commitment for that 12-month period and shall be considered a major source of HAP beginning the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, each such facility would be subject to the provisions of this subpart as noted in 40 CFR 63.820(a)(1) and would no longer be eligible to use the provisions of 40 CFR 63.820(a)(2), even if in subsequent 12-month periods the facility uses less HAP than the thresholds in 40 CFR 63.820(a)(2).

- E. Pursuant to 567 IAC 23.1(4)"ak", as referenced in 40 CFR 63.820(a)(6), an owner or operator of an affected source subject to 40 CFR 63.820(a)(2) who chooses to no longer be subject to 40 CFR 63.820(a)(2) shall notify the Administrator of such change. If, by no longer being subject to 40 CFR 63.820(a)(2), the facility at which the affected source is located becomes a major source:
 - (i). The owner or operator of an existing source must continue to comply with the HAP usage provisions of 40 CFR 63.820(a)(2) until the source is in compliance with all relevant requirements for existing affected sources under this subpart;
 - (ii). The owner or operator of a new source must continue to comply with the HAP usage provisions of 40 CFR 63.820(a)(2) until the source is in compliance with all relevant requirements for new affected sources under this subpart.

Recordkeeping requirements

A. Pursuant to 567 IAC 23.1(4)"ak", as referenced in 40 CFR 63.829(d), the permittee shall maintain records of all required measurements and calculations needed to demonstrate compliance with 40 CFR 63.820(a)(2), including the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis.

Reporting requirements

- A. Pursuant to 567 IAC 23.1(4)"ak", as referenced in 40 CFR 63.830(b)(1), the permittee shall submit the following report(s) to the Administrator:
 - 1. An initial notification required in 40 CFR 63.9(b).

General Provisions

- A. At all times, including periods of startup, shutdown, and malfunction, the permittee shall operate and maintain any affected source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards.

 40 CFR 63.6(e)(1)(i)
- B. Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the Administrator, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures (including the startup, shutdown, and malfunction plan, review of operation and maintenance records, and inspection of the source).

C. Prohibited Activities:

- 1. The permittee shall not operate any affected source in violation of the requirements of this part except under:
 - (a). An extension of compliance granted by the Administrator under this part; or
 - (b). An extension of compliance granted under this part by a State with an approved permit program; or
 - (c). An exemption from compliance is granted by the President under section 112(i)(4) of the Clean Air Act.
- 2. The permittee shall not fail to keep records, notify, report, or revise reports as required under this part.

 40 CFR 63.4(a)

D. Circumvention:

- 1. The permittee shall not build, erect, install, or use any article, machine, equipment, or process to conceal an emission that would otherwise constitute noncompliance with a relevant standard. Such concealment includes, but is not limited to:
 - (a). The use of diluents to achieve compliance with a relevant standard based on the concentration of a pollutant in the effluent discharged to the atmosphere.
 - (b). The use of gaseous diluents to achieve compliance with a relevant standard for visible emissions.
 - (c). The fragmentation of an operation such that the operation avoids regulation by a relevant standard.

 40 CFR 63.4(b)

Authority for Requirement: 567 IAC 23.1(4)"ak", 40 CFR 63 Subpart KK, 40 CFR 63 Subpart A

III. Emission Point-Specific Conditions

Facility Name: American Packaging Corporation

Permit Number: 00-TV-058R1

Emission Point ID Number: EP-D and EP-DB

Associated Equipment

Table 1 – Emission Units

EP	EU	EU Description	Raw Material/ Fuel	Rated Capacity	CE ID & Description			
EP-D		PSD Units						
EP-DB				•	CE-02			
	CE-01D	Afterburner Dryer	Natural Gas	5.1 MMBtu/hr	Thermal			
	CE-02D	Afterburner Dryer	Natural Gas	6.0 MMBtu/hr	Oxidizers			
	FLX51.286 ^(*)	Flexographic Press No. 5	Solvent-based Inks	1,722.9 lb/hr				
	FLX51.286-D1	Flexographic Press No. 5 Deck Dryer	Natural Gas	0.48 MMBTU/hr				
	FLX51.286-D2	Flexographic Press No. 5 Tunnel Dryer	Natural Gas	0.53 MMBTU/hr				
	T A MO2	A Harris I aminata NI 2	Solvent-based Inks	887.2 lb/hr				
	LAM03	Adhesive Laminator No. 3	Water-based Coatings	672.1 lb/hr				
	LAM03-D	Adhesive Laminator No. 3 Dryer	Natural Gas	2.8 MMBTU/hr				
			Solvent-based Coating	887.2 lb/hr				
	RG03	Rotogravure No. 3	Water-based Coatings	747.2 lb/hr				
			Cold Seal	723.8 lb/hr				
	RG03-D	Rotogravure No. 3 Dryer	Natural Gas	2.8 MMBTU/hr				
	FLX51.286a	Flexographic Press No. 6	Solvent-based Inks	1,722.9 lb/hr				
	FLX51.286a-D1	Flexographic Press No. 6 Deck Dryer	Natural Gas	0.48 MMBTU/hr				
Flavographia Dragg No. 6 Tunnal		Natural Gas	0.53 MMBTU/hr					
	LAM04 ^(*)	Adhesive Laminator No. 4	Solvent-based Inks	887.2 lb/hr				
	LAM04	Adhesive Laminator No. 4	Water-based Coatings	672.1 lb/hr				
	LAM04-D ^(*)	Adhesive Laminator No. 4 Dryer	Natural Gas	2.8 MMBTU/hr				
			Solvent-based Coating	887.2 lb/hr				
	RG04 ^(*) Rot	Rotogravure No. 4	Water-based Coatings	747.2 lb/hr				
			Cold Seal	723.8 lb/hr				
	RG04-D ^(*)	Rotogravure No. 4 Dryer	Natural Gas	2.8 MMBTU/hr				
	LAM05 ^(*)	Adhesive Laminator No. 5	Solvent-based Adhesives	214.5 lb/hr				
			Water-based Coatings	250 lb/hr				
LAM05-D ^(*) Adhesiy		Adhesive Laminator No. 5 Dryer	Natural Gas	2.8 MMBTU/hr	 			
	CT08	Corona Treater No. 8	Electricity, Paper	10 KWe	[.			
	CT09	Corona Treater No. 9	Electricity, Paper	30 KWe	 			
	CT10 ^(*)	Corona Treater No. 10	Electricity, Paper	10 KWe	 			
	CT11 ^(*)	Corona Treater No. 11	Electricity, Paper	30 KWe]			
	CT12 ^(*)	Corona Treater No. 12	Electricity, Paper	5 KWe				

Table 1 – Emission Units (Continued)

EP	EU	EU Description	Raw Material/ Fuel	Rated Capacity	CE ID & Description
EP-D EP-DB			CE-01 CE-02		
	FLX7660	Flexographic Press No. 2	Solvent-based Inks	149.3 lb/hr	Thermal
	FLX7660-D	Flexographic Press No. 2 Dryer	Natural Gas	0.8 MMBtu/Hr	Oxidizers
	LAM01	Adhesive Laminator No. 1	Solvent-based Inks	392.9 lb/hr	
	LAM01-D	Adhesive Laminator No. 1 Dryer	Natural Gas	1.5 MMBtu/Hr	
	FLX7719	Vision Flexographic Press	Solvent-based Inks	149.3 lb/hr	
	FLX7719-D	Vision Flexographic Press Dryer	Natural Gas	0.8 MMBtu/Hr	
	FLX41.569	W & H Flexographic Press	Solvent-based Inks	1,033.3 lb/hr	
	FLX41.569-D	W & H Flexographic Press Dryer	Natural Gas	1.6 MMBtu/Hr	
	RG01	Rotogravure Unit No. 1	Solvent-based Coating	165.7 lb/hr	
	RG01-D	Rotogravure Unit No. 1 Dryer	Natural Gas	0.8 MMBtu/Hr	
	RG02	Rotogravure Unit No. 2	Solvent-based Coating	165.7 lb/hr	
	RG02-D	Rotogravure Unit No. 2 Dryer	Natural Gas	0.8 MMBtu/Hr	
	RENZ	Renzmann Parts Washer	Cleanup Solvents	1.55 lb/hr	

^(*) Those units of Press Line #2 have not been installed at the issuance time of this Title V permit.

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Table 2 – General Emission Limits

EP	EU	Opacity	PM	SO_2	Iowa DNR Construction Permit #
EP-D	See List in Table 1	40% ^(1,2)	0.1 gr/dscf	500 ppmv	04-A-589-P
EP-DB	See List III Table I	40% ^(1,2)	0.1 gr/dscf	500 ppmv	04-A-588-P

⁽¹⁾ While the PSD Emission Units are operating, an exceedance of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

While the PSD Emission Units are not operating, an exceedance of the indicator opacity of 25% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Table 3 – Authority for General Emission Limits in Table 2

Pollutant	Emission Limits	Authority for Requirement		
Opacity 40%		567 IAC 23.3(2)"d" and Iowa DNR Construction Permits		
Opacity	40%	Referenced in Table 2		
PM	0.1 ar/deaf	567 IAC 23.3(2)"a" and Iowa DNR Construction Permits		
PM 0.1 gr/dscf		Referenced in Table 2		
90	500 nnmv	567 IAC 23.3(3)"e" and Iowa DNR Construction Permits		
SO_2	500 ppmv	Referenced in Table 2		

Table 4 – BACT limits

Pollutant	Capture	Reduction	Tons/yr	(Monthly Weighted Avera	
VOC	100% ⁽¹⁾	95% ⁽²⁾	373.04 ⁽³⁾	0.041 ⁽⁴⁾ for Printing Lines #1 & 2	0.0328 ⁽⁴⁾ for Laminator #5
Ozone	100% ⁽¹⁾	95% ⁽²⁾	NA	N/A	NA

The facility shall construct either a temporary or permanent total enclosure to capture all emissions from the PSD emission units listed in Table 1. The total enclosure shall meet the requirements of 40 CFR §52.741 Appendix B, Procedure T – Criteria for and Verification of a Permanent or Temporary Total Enclosure. All captured emissions shall be vented to the thermal oxidizers (CE-01 and CE-02).

- Printing line #1 (EUs FLX51.286, FLX51.286-D1, FLX51.286-D2, LAM03, LAM03-D, RG03, RG03-D, CT08, and CT09) is limited to 0.041 lbs of VOC emissions/lb of all materials used on Printing Line #1
- Printing line #2 (EUs FLX51.286a, FLX51.286a-D1, FLX51.286a-D2, LAM04, LAM04-D, RG04, RG04-D, CT10, and CT11) is limited to 0.041 lbs of VOC emissions/lb of all materials used on Printing Line #2
- Laminator #5 (EU LAM05) is limited to 0.0328 lbs of VOC emissions/lb of all materials used on Laminator #5
- These limits are monthly weighted averages.

Authority for Requirement: Iowa DNR Construction Permits 04-A-588-P and 04-A-589-P

Table 5 – Emission Limits for PSD Emission Units Listed in Table 1

EP	EU	PM (lb/hr)	PM ₁₀ (lb/hr)	VOC (lb/hr)	Authority for Requirements: IDNR Construction Permits
EP-D	See PSD Units	3.29 ⁽¹⁾	3.29(1)	251.5 ⁽¹⁾	04-A-589-P
EP-DB	in Table 1	3.49	3.49	231.3	04-A-588-P

⁽¹⁾ Standard is expressed as the average of 3 runs and it is the combined limit for all the PSD units listed in Table 1.

⁽²⁾ The destruction efficiency of the thermal oxidizers (CE-01 and CE-02) shall be a minimum of 95%.

⁽³⁾ Standard is a 12-month rolling total for all PSD units listed in Table 1.

⁽⁴⁾ The following limits apply to the PSD emission units:

Table 6 – Emission Limits for Non-PSD Emission Units Listed in Table 1

EP	EU	VOC (tons/yr)	Authority for Requirements: IDNR Construction Permits
EP-D	See PSD Units	175.8 ^(1,2)	04-A-589-P
EP-DB	in Table 1	1/3.0	04-A-588-P

⁽¹⁾ Standard is a 12-month rolling total.

NESHAP Applicability

The emission units listed in Table 1 are subject to Subpart A (General Provisions, 40 CFR §63.1 – 40 CFR §63.15) and Subpart KK (National Emission Standards for the Printing and Publishing Industry, 40 CFR §63.820 – 40 CFR §63.839) of the National Emission Standards for Hazardous Air Pollutants (NESHAP). See Plant-Wide Conditions section (page 9) for details.

Authority for Requirement: Iowa DNR Construction Permits 04-A-588-P and 04-A-589-P

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Operating limits for the emission units listed in Table 1:

- A. The fuel used by the thermal oxidizers (CE-01 and CE-02) and all dryers listed in Table 1 shall be limited to natural gas.
- B. The thermal oxidizers (CE-01 and CE-02) shall initially be maintained at a minimum temperature of 1450 °F. After testing, the oxidizers shall be maintained at a minimum temperature that demonstrates a VOC destruction efficiency of 95% to the Department's satisfaction.
- C. This facility is subject to all applicable operating limits set forth in 40 CFR Part 63 Subpart A (General Provisions) and 40 CFR Part 63 Subpart KK (National Emission Standards for the Printing and Publishing Industry).

Operating Limits Specific to PSD Emission Units:

- D. The PSD Flexographic presses (EUs FLX51.286 and FLX51.286a) shall not use water-based materials.
- E. The PSD Flexographic presses (EUs FLX51.286 and FLX51.286a) are each limited to 7,573,301 lbs of materials per rolling twelve (12) month period.

⁽²⁾Limit is the combined limit for all the non-PSD units listed in Table 1 for the use of solvent-based inks. Refer to Tables 7 and 8 in the Operating Limits section below for material usage restrictions that result in the 175.8 tons (which is the summation of 21 tpy for Rotogravure Units #1 and #2 and 154.79 tpy for other Non-PSD units) of VOC per year limit for these emission points, for solvent-based ink.

- F. Laminator No. 3 and Laminator No. 4 (EUs LAM03 and LAM04) are each limited to 4,780,769 lbs of materials per rolling twelve (12) month period.
- G. The PSD Rotogravure units (EUs RG03 and RG04) are each limited to 7,158,347 lbs of materials per rolling twelve (12) month period.
- H. Laminator No. 5 (EU LAM05) is limited to 1,424,172 lbs of materials per rolling twelve (12) month period.

Operating Limits Specific to Non-PSD Emission Units:

Table 7

Emission Unit	Material	VOC Emission Limit ⁽¹⁾
Flexographic Press No. 2 (EU FLX7660)	Solvent-based ⁽²⁾	
Adhesive Laminator Unit #1(EU LAM01)	Solvent-based ⁽²⁾	
Vision Flexographic Press (EU FLX7719)	Solvent-based ⁽²⁾	154.79 tons/yr ^(3, 5)
W & H Flexographic Press (EU FLXX41.569)	Solvent-based ⁽²⁾	
Renzmann Parts Washer (EU RENZ)	Solvent-based ⁽²⁾	

Table 8

Emission Unit	Material	VOC Emission Limit
Rotogravure Unit #1 (EU RG01)	Solvent-based ⁽²⁾	21 tons/yr (4, 5)
Rotogravure Unit #2 (EU RG02)	Solvent-based ⁽²⁾	21 wiis/yi

⁽I) VOC usage shall be monitored and recorded as required in the Reporting and Record Keeping Section below.

- I. When solvent-based materials are used in the any of the emission units listed in the Tables 7 or 8, the emissions shall be vented to either thermal oxidizer (CE-01 or CE-02) before being exhausted to the atmosphere.
- J. The capture efficiency of the laminator and presses listed in Tables 7 and 8 during solvent-based material application shall be at least 85%.
- K. The capture efficiency of the rotogravure units listed in Table 8 during solvent-based material application shall be 100%.

⁽²⁾ Solvent-based materials shall be defined as any material with a VOC content greater than or equal to 25% (by weight).

⁽³⁾ The VOC emission limit for the emission units listed in Table 7 shall not exceed 154.79 tons/yr. This is a controlled emission limit.

⁽⁴⁾ The VOC emission limit for the emission units listed in Table 8 shall not exceed 21 tons/yr. This is a controlled emission limit.

⁽⁵⁾ The VOC usage restrictions are twelve month rolling totals.

Reporting & Record Keeping:

Records shall be maintained on site for five (5) years and be available for inspection upon request by representatives of the Department of Natural Resources. These records shall show the following:

- A. Daily hours of operation of the thermal oxidizers (CE-01 and CE-02).
- B. Temperature of the oxidizers (CE-01 and CE-02) shall be monitored on a continuous basis and an alarm shall be set to sound if the temperature falls below that required in Condition B of the Operating Limits Section above. If the oxidizer temperature falls below that required in Condition B of the Operating Limits Section above, the facility shall record the temperature, time, and date of the event every ten minutes until the required temperature is achieved, along with a description of the corrective actions taken.
- C. Material Safety Data Sheets (MSDS) for each material used in any of the units.
- D. This facility is subject to all applicable monitoring and/or recordkeeping requirements as set forth in 40 CFR Part 63 Subpart A (General Provisions) and 40 CFR Part 63 Subpart KK (National Emission Standards for the Printing and Publishing Industry).

Operating Condition Monitoring Specific to PSD Emission Units:

- E. The monthly weighted averages of Printing Lines #1 & #2 and Laminator #5 in lbs of VOC emissions per lbs of material used. The monthly weighted average shall be calculated by:
 - Sum all materials used each month and the total VOC of those materials for that month,
 - Multiplying the total VOC by 0.05 to get an adjusted VOC emission rate, and
 - Dividing the adjusted VOC emission rate (in lbs) by the total materials (in lbs) used for the month.
- F. For the first twelve (12) months of operation, calculate the total material usage for the PSD Flexographic Presses (EUs FLX51.286 and FLX51.286a) for each month of operation.
- G. After the first twelve (12) months of operation, determine the cumulative material usage for the PSD Flexographic Presses (EUs FLX51.286 and FLX51.286a) on a rolling-12-month basis for each month of operation.
- H. For the first twelve (12) months of operation, calculate the total material usage for Laminator No. 3 and Laminator No. 4 (EUs LAM03 and LAM04) for each month of operation.
- I. After the first twelve (12) months of operation, determine the cumulative material usage for Laminator No. 3 and Laminator No. 4 (EUs LAM03 and LAM04) on a rolling-12-month basis for each month of operation.

- J. For the first twelve (12) months of operation, calculate the total material usage for the Rotogravure units (EUs RG03 and RG04) for each month of operation.
- K. After the first twelve (12) months of operation, determine the cumulative material usage for the Rotogravure units (EUs RG03 and RG04) on a rolling-12-month basis for each month of operation.
- L. For the first twelve (12) months of operation, calculate the total material usage for Laminator No. 5 (EU LAM05) for each month of operation.
- M. After the first twelve (12) months of operation, determine the cumulative material usage for Laminator No. 5 (EU LAM05) on a rolling-12-month basis for each month of operation.
- N. For the first twelve (12) months of operation, calculate the total emissions (in tons/month) for the PSD emission units listed in Table 1 for each month of operation.
- O. After the first twelve (12) months of operation, determine the cumulative emissions (in tons/yr) for the PSD emission units listed in Table 1 on a rolling-12-month basis for each month of operation.
- P. Documentation shall be maintained at the plant that demonstrates a total enclosure has been installed for Printing Lines #1 and #2 and Laminator #5. This installation is a BACT requirement per the BACT Limits Section above (See Footnote 1 to Table 4.)

Operating Condition Monitoring Specific to Non-PSD Emission Units:

Q. The amount and VOC content of each material (solvent-based) used in the emission units listed in Tables 7 and 8 above. The VOC usage shall be determined by multiplying the monthly usage of each material by its VOC content considering capture and control efficiencies. Both fugitive and captured emissions must be calculated for the units listed in Table 1. After each month these units are used, the twelve-month rolling total shall be calculated and updated. This record may be maintained electronically.

Authority for Requirement: Iowa DNR Construction Permits 04-A-588-P and 04-A-589-P

Emission Point Characteristics

The emission points shall conform to the specifications listed below.

Table 9 -	- Stacks		Stack Characteristics				
EP	EU	Construction Permit #	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Exhaust Temp. (°F)	Exhaust Flowrate (scfm)
EP-D	See List in	04-A-589-P	40	Unobstructed vertical	44	300 - 400	20,000 – 40,000
EP-DB	Table 1	04-A-588-P	40	Unobstructed vertical	60	300 - 400	20,000 – 40,000

Authority for Requirement: Iowa DNR Construction Permits Referenced in Table 9.

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Stack Testing:

EP	Test Required	Test Method	Demonstrate Compliance By	Authority for Requirement: IDNR Construction Permits
EP-D	VOC ^(1,2)	40 CFR 60, Appendix A, Method 25A	(3)	04-A-589-P
EP-DB	$VOC^{(1,2)}$	40 CFR 60, Appendix A, Method 25A	(3)	04-A-588-P

Note: The facility conducted testing after Press Line #1 was installed and started up. However, the facility must test the oxidizers again after press line #2 is installed and started up. The Press Line #2 units consist of the units marked by (*) in the EU column of Table 1.

- Inlet and outlet testing with only the PSD emission units operating and the lines using only solvent-based materials.
- The VOC emission rate (in lb of VOC/lb of material) with only the PSD emission units operating and the lines using only solvent-based materials.

⁽¹⁾ The following testing is required:

⁽²⁾ Total enclosure compliance shall be verified by the methods outlined in 40 CFR §52.741 Appendix B, Procedure T – Criteria for and Verification of a Permanent or Temporary Total Enclosure.

(3) The compliance tests must be conducted within sixty (60) days after achieving maximum production rate and no later than one hundred eighty (180) days after the initial startup date of the proposed equipment.
The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)
Agency Approved Operation & Maintenance Plan Required? Yes □ No □
Facility Maintained Operation & Maintenance Plan Required? Yes □ No □
See CAM plans for thermal oxidizers, total enclosure systems, and partial enclosure systems.

Authority for Requirement: 567 IAC 22.108(3)

Compliance Assurance Monitoring (CAM) Plan Catalytic Oxidizers (CE-01 and CE-02) for VOC Control

I. Background

A. Emission Units

Description: Flexographic and Rotogravure Press Lines (See Table 1 for Details)

Identification: Various Units (See Table 1 for Details)

Stack designation: EP-D and EP-DB

B. Applicable Regulation, Emission Limit, and Monitoring Requirements

Regulation No.: Iowa DNR Construction Permits 04-A-588-P and 04-A-589-P

Regulated pollutant: VOC

Emission limit: 95% VOC destruction efficiency and various VOC emission limits (See

Tables 4, 5, and 6 for details)

Monitoring requirements in permits: Oxidizer temperature monitored continuously

C. Control Technology: Regenerative Thermal oxidizers (w/o cold-side bypass)

II. Monitoring Approach

The key elements of the monitoring approach, including the indicators to be monitored, indicator ranges, and performance criteria are presented in Table A.

(The table was adapted from the EPA's "Technical Support Document for Title V Permitting of Printing Facilities" dated January 2005, Protocol 1 for thermal oxidizers, pages D-48 through D-49.)

Table A. Monitoring Approach for Thermal Oxidizers

	Indicator #1	Indicator #2	Indicator #3
1. Indicator	Oxidizer operating temperature.	Work practice/inspection.	Performance test
Measurement Approach	Continuously record the operating temperature of the oxidizer combustion zone.	Inspect internal and external structural integrity of oxidizer, including assessment of valves for leakage, to ensure proper operation.	Conduct emissions test to demonstrate compliance with permitted destruction efficiency of 95% at minimum. (* See note below)
2. Indicator Range	An excursion is identified as a temperature measurement of less than 1450 °F or the temperature that demonstrates a VOC destruction efficiency of 95% to the Department's satisfaction during the most recent compliance demonstration.	An excursion is identified as any finding that the structural integrity of the oxidizer has been jeopardized and it no longer operates as designed, or leakage of values is identified.	An excursion is identified as any finding that the oxidizer does not meet the permitted destruction efficiency.
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement, including those in Condition B of the Reporting & Recordkeeping Section (p. 17.)	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.
3. Performance Criteria			
A. Data Representativeness	Any temperature-monitoring device employed to measure the oxidizer combustion zone temperature shall be accurate to within 0.5% of temperature measured or ±5 °F, whichever is greater.	Inspections of the oxidizer system will identify problems.	A test protocol shall be prepared and approved by the IDNR prior to conducting the performance test.
B. Verification of Operational Status	Temperatures recorded on chart paper or electronic media, and installation of temperature alarm system as required in Condition B of the Reporting & Recordkeeping Section (p. 17.)	Inspection records.	Not applicable.
C. QA/QC Practices and Criteria	Validation of temperature system conducted annually. Acceptance criteria ±20 °F.	Not applicable.	EPA test methods approved in protocol.

Table A. Monitoring Approach for Thermal Oxidizers (Continued)

	Indicator #1	Indicator #2	Indicator #3
D. Monitoring Frequency	Measured continuously.	Follow manufacture's maintenance and inspection schedule.	The tests must be conducted by March 10, 2008. (* See note below)
Data Collection Procedure	Recorded at least every 10-minutes on a chart or electronic media.	Record results of inspections and observations.	Per approved test method.
Averaging Period	Not applicable.	Not applicable.	Not applicable.
E. Record Keeping	Maintain for a period of 5 years records of chart recorder paper or electronic media and corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections and corrective actions taken in response to excursions.	Maintain a copy of the test report for 5 years or until another test is conducted. Maintain records of corrective actions taken in response to excursions.
F. Reporting	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.	Submit written notice to IDNR not less than 30 days before the testing. Results of the test shall be submitted in writing to the IDNR within 6 weeks of the completion of the testing.
Frequency	Semiannually.	Semiannually.	For each performance test conducted.

^{*} Note: The testing requirements, except reporting the possible excursions and associated corrective actions taken, will be considered fulfilled if the testing requirements (see p. 19 for details) required by the construction permits are satisfied.

Compliance Assurance Monitoring (CAM) Plan Capture Systems for VOC Control: Permanent Total Enclosures

I. Background

A. Emission Units

Description & Identification: The units in the following table and their associated driers are required to have permanent total enclosures (assumed 100% capture.)

EP	EU	EU Description
	FLX51.286	Flexographic Press No. 5
	LAM03	Adhesive Laminator No. 3
	RG03	Rotogravure No. 3
	FLX51.286a	Flexographic Press No. 6
EP-D/DB	LAM04	Adhesive Laminator No. 4
	RG04	Rotogravure No. 4
	LAM05	Adhesive Laminator No. 5
	RG01	Rotogravure Unit No. 1
	RG02	Rotogravure Unit No. 2

B. Applicable Regulation, Emission Limit, and Monitoring Requirements

Regulation No.: Iowa DNR Construction Permits 04-A-588-P and 04-A-589-P

Regulated pollutant: VOC

Emission limit: 100% capture efficiency

Monitoring requirements in permits: 40 CFR 52.741, Appendix B, Procedure T – Criteria

for and Verification of a Permanent or Temporary Total Enclosure

C. Capture System: Permanent Total Enclosure

II. Monitoring Approach

The key elements of the monitoring approach, including the indicators to be monitored, indicator ranges, and performance criteria are presented in Table B.

(The table was adapted from the EPA's "Technical Support Document for Title V Permitting of Printing Facilities" dated January 2005, Protocol C for capture system for VOC control – permanent total enclosures, pages D-33 through D-34.)

Table B. Monitoring Approach for Permanent Total Enclosures Utilizing Pressure Differential

	Indicator #1	Indicator #2
1. Indicator	Pressure differential	Work Practice
Measurement Approach	Monitor pressure differential across the enclosure wall and the surrounding atmosphere.	Inspect the integrity of the exhaust system from the process to the control device, and the integrity of the enclosure.
2. Indicator Range	An excursion is defined as a pressure differential of less than -0.007 in. w.c. for 15 consecutive minutes; this pressure differential was demonstrated as adequate to qualify the permanent total enclosure with Method 204 during the most recent performance test.	An excursion is identified as any finding that the integrity of the exhaust system ductwork, or the enclosure have been compromised.
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.
3. Performance Criteria		
A. Data Representativeness	A measure of the pressure differential at the interface between the wall of the enclosure and surrounding atmosphere assures that the permanent total enclosure is maintained under negative pressure.	Properly positioned dampers, leak- free ductwork and a leak-free enclosure will assure that all of the exhaust will reach the control device. Inspections will identify problems.
B. Verification of Operational Status	Not applicable.	Inspection records.
C. QA/QC Practices and Criteria	Validation of instrument calibration conducted annually. Compare to calibrated meter, or calibrate using pressure standard, or according to manufacturer's instructions.	Not applicable.
D. Monitoring Frequency	Monitor continuously.	Semiannually.
Data Collection Procedure	N/A. The system shall be designed so that the process will be shut down by the monitoring control if an excursion continues for 15 consecutive minutes.	Record results of inspections and observations.
Averaging Period	Not applicable.	Not applicable.
E. Record Keeping	Maintain for a period of 5 years records of data and of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections and of corrective actions taken in response to excursions.
F. Reporting	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.
Frequency	Semiannually.	Semiannually.

Compliance Assurance Monitoring (CAM) Plan Capture Systems for VOC Control: Permanent Non-Total Enclosures

I. Background

A. Emission Units

Description & Identification: The units in the following table and their associated driers are required to have permanent non-total enclosures (85% capture.)

EP	EU	EU Description
	FLX7660	Flexographic Press No. 2
EP-D/DB	LAM01	Adhesive Laminator No. 1
	FLX7719	Vision Flexographic Press
	FLX41.569	W & H Flexographic Press

B. Applicable Regulation, Emission Limit, and Monitoring Requirements

Regulation No.: Iowa DNR Construction Permits 04-A-588-P and 04-A-589-P

Regulated pollutant: VOC

Emission limit: 85% capture efficiency Monitoring requirements in permits: None

C. Capture System: Non-Total Enclosure

II. Monitoring Approach

The key elements of the monitoring approach, including the indicators to be monitored, indicator ranges, and performance criteria are presented in Table C.

(The table was adapted from the EPA's "Technical Support Document for Title V Permitting of Printing Facilities" dated January 2005, Protocol D for capture system for VOC control – enclosures, pages D-37 through D-38. The non-total enclosures in the facility do not have doors therefore sensors and interlocks in the Protocol D are not applicable to the facility.)

Table C. Monitoring Approach for Enclosures Utilizing an Indicator of Flow, and Routine Inspections

	Indicator #1	Indicator #2
1. Indicator	Enclosure Exhaust Flow	Work Practice
Measurement Approach	A flow sensor (static pressure measurement) is used as an indicator to monitor the total exhaust flow rate from the enclosure.	Inspect the integrity of the exhaust system from the process to the control device, and the integrity of the enclosure.
2. Indicator Range	An excursion is identified as anytime the static pressure becomes more positive than -0.1 in. w.c.	An excursion is identified as any finding that the integrity of the ductwork, or the enclosure have been compromised.
Corrective Action	Each excursion triggers corrective action and a reporting requirement.	Each excursion triggers an inspection, corrective action and a reporting requirement.
3. Performance Criteria		
A. Data Representativeness	Continuously monitoring an indicator of flow assures the minimum required flow rate from the enclosure is maintained and the enclosure is maintained under negative pressure.	Properly positioned dampers, leak free ductwork and enclosure will assure that all of the exhaust will reach the control device. Inspections will identify problems.
B. Verification of Operational Status	The instrument is installed and calibrated according to the manufacturer's instructions.	Inspection records.
C. QA/QC Practices and Criteria	Annually verify that the instrument used is reading accurately.	Not applicable.
D. Monitoring Frequency	Measured continuously.	Quarterly.
Data Collection Procedure	N/A. The system shall be designed so that the process will be shut down by the monitoring control if an excursion continues for 15 consecutive minutes.	Record results of inspections and observations.
Averaging Period	Not applicable.	Not applicable.
E. Recordkeeping	Maintain for a period of 5 years records of inspections and of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections and of corrective actions taken in response to excursions.
F. Reporting	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.

Emission Point ID Number: EP-D1

Associated Equipment

Associated Emission Unit ID Number: FLX7660-A, FLX7660-D

Emission Unit vented through this Emission Point: FLX7660-A

Emission Unit Description: Flexographic Press No. 2

Raw Material/Fuel: Water-based Inks

Rated Capacity: 100.1 lb/hr

Emission Unit vented through this Emission Point: FLX7660-D Emission Unit Description: Flexographic Press No. 2 Dryer

Raw Material/Fuel: Natural Gas Rated Capacity: 0.8 MMBtu/hr

Note: There is no control equipment for water-based application. Thermal oxidizers for EP-

D and EP-DB are for solvent-based application.

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"d" (Iowa DNR Construction Permit 99-A-351-S2)

(1) An exceedance of any visible emissions will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter Emission Limit(s): 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a" (Iowa DNR Construction Permit 99-A-351-S2)

Pollutant: Sulfur Dioxide (SO₂) Emission limit(s): 500 ppmv

Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 18.83 TPY (1)

Authority for Requirement: Iowa DNR Construction Permit 99-A-351-S2

⁽¹⁾ This limit is for the use of water-based ink only. Refer to Operating Limits for the material usage restriction that results in the 18.83 tons of VOC per year limit on water-based ink.

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Operating limits for these emission units shall be:

Emission Unit	<u>Material</u>	Max. VOC Usage	VOC Content
Flexographic Press No. 2	Water-based	18.83 tons/yr	< 25%

Notes:

- (1). VOC usage shall be monitored and recorded as required in this section by multiplying the amount of each material used and the VOC content of the material.
- (2). VOC usage restrictions in tons/yr refer to a twelve-month rolling total.
- (3). Water-based materials shall be defined as any material with a VOC content less than 25% (by weight).
- A. When solvent-based materials are used in the flexographic press the emissions shall be vented to the thermal oxidizer (for EP-D/DB) before being exhausted to the atmosphere. Solvent-based materials shall be defined as any material with a VOC content greater than or equal to 25% (by weight). When water-based materials are used emissions may be vented directly to the atmosphere (via EP-D1).
- B. The maximum capacity of the vision flexographic dryer shall not exceed 1.6 MMBtu/hr
- C. The fuel used by the vision flexographic dryer shall be limited to natural gas.
- D. The capture system for VOC emissions from the flexographic press shall be designed for a minimum capture efficiency of 85% of VOCs from solvent based coating.
- E. This facility (plant number 85-03-003) is subject to all applicable operating limits set forth in 40 CFR Part 63 Subpart A (General Provisions) and 40 CFR Part 63 Subpart KK (National Emission Standards for the Printing and Publishing Industry). See Plant-Wide Conditions section (page 9) for details.

Reporting & Record keeping:

Records shall be maintained on site for five (5) years and be available for inspection upon request by representatives of the Department of Natural Resources. These records shall show the following:

- A. The amount and VOC content of each material used in the flexographic press. The VOC usage shall be determined by multiplying the monthly usage of each material by its VOC content. After each month these units are used, the twelve-month rolling total shall be calculated and updated. This record may be maintained electronically.
- B. Material Safety Data Sheets (MSDS) for each material used in any of the units.
- C. This facility (plant number 85-03-003) is subject to all applicable monitoring and/or recordkeeping requirements as set forth in 40 CFR Part 63 Subpart A (General Provisions) and 40 CFR Part 63 Subpart KK (National Emission Standards for the Printing and Publishing Industry).

Authority for Requirement: Iowa DNR Construction Permit 99-A-351-S2

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height (feet, from the ground): 46.6

Stack Opening (inches, dia): 20

Exhaust Temperature (°F): 150 ° - 200 °F

Exhaust Flowrate (scfm): 5,000

Discharge Style: Vertical Unobstructed

Authority for Requirement: Iowa DNR Construction Permit 99-A-351-S2

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes \square No \boxtimes
Facility Maintained Operation & Maintenance Plan Required? Yes 🗌 No 🗵
Compliance Assurance Monitoring (CAM) Plan Required? Yes 🗌 No 🖂
Authority for Requirement: 567 IAC 22.108(3)

American Packaging 30 00-TV-058R1, 3/10/06

Emission Point ID Number: EP-D2, EP-D3, EP-D4, EP-D5, and EP-D6

Associated Equipment

Table 1 - Units

EP	EU	EU Description	Raw Material/ Fuel	Rated Capacity
EP-D2	LAM01-A	Adhesive Laminator No. 1	Water-based Coatings	297.9 lb/hr
E1 -D2	LAM01-D	Adhesive Laminator No. 1 Dryer	Natural Gas	1.5 MMBtu/hr
EP-D3 FLX7719-A		Vision Flexographic Press	Water-based Inks	100.1 lb/hr
EP-D3	FLX7719-D	Vision Flexographic Press Dryer	Natural Gas	0.8 MMBtu/hr
EP-D4 RG01-A		Rotogravure Unit No. 1	Water-based Coatings	165.7 lb/hr
EF-D4	RG01-D	Rotogravure Unit No. 1 Dryer	Natural Gas	1.6 MMBtu/hr
EP-D5 RG02-A		Rotogravure Unit No. 2	Water-based Coatings	165.7 lb/hr
EF-D3	RG02-D	Rotogravure Unit No. 2 Dryer	Natural Gas	1.6 MMBtu/hr
EP-D6	FLX41.569-A	W&H Flexographic Press	Water-based Inks	690.2 lb/hr
EF-D0	FLX41.569-D	W&H Flexographic Press Dryer	Natural Gas	1.6 MMBtu/hr

Note: There is no control equipment for water-based application. Thermal Oxidizers for EP-D and EP-DB are for solvent-based application.

Applicable Requirements

Table 2 – Emission Limits

EP	EU	Opacity	PM	SO ₂	VOC	Iowa DNR Construction Permit #
EP-D2	LAM01-A LAM01-D	40% ⁽¹⁾	0.1 gr/dscf	500 ppmv		96-A-559-S4
EP-D3 FLX7719-A		40% ⁽¹⁾	0.1 gr/dscf	500 ppmv		97-A-429-S3
LI -D3	FLX7719-D	40 /0	0.1 gi/usci	Joo ppiiiv	65.0 tpy ⁽²⁾	71-11-427-03
EP-D4	RG01-A	40% ⁽¹⁾	0.1 gr/dscf	500 ppmv		99-A-346-S2
	RG01-D					
EP-D5	RG02-A	40% ⁽¹⁾	0.1 gr/dscf	500 ppmv		99-A-347-S2
	RG02-D					77-A-347-32
EP-D6	FLX41.569-A	40% ⁽¹⁾	0.1 gr/dscf	500 ppmv		97-A-430-S4
	FLX41.569-D					71-A-430- 3 4

⁽¹⁾ An exceedance of any visible emissions will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If the exceedance continues after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

⁽²⁾ Total VOCs (water-based only) for EP-D2, EP-D3, EP-D4, EP-D5 & EP-D6 shall not exceed 65.0 tons per year. Refer to Operating Limits for material usage restrictions that result in the 65.0 tons of VOC per year limit on water-based ink.

Table 3 – Authority for General Emission Limits in Table 2

Pollutant	Emission Limits	Authority for Requirement
Openity	40%	567 IAC 23.3(2)"d" and Iowa DNR Construction Permits
Opacity	40%	Referenced in Table 2
PM	0.1 gr/dscf	567 IAC 23.3(2)"a" and Iowa DNR Construction Permits
PIVI		Referenced in Table 2
20	500 ppmv	567 IAC 23.3(3)"e" and Iowa DNR Construction Permits
SO_2		Referenced in Table 2
VOC	65.0 tpy	Iowa DNR Construction Permits Referenced in Table 2

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Operating limits for these emission units shall be:

Emission Unit	<u>Material</u>	Total Max. VOC Usage	VOC Content
Adhesive Laminator Unit #1 (EP-D2)	Water-based		<25%
Vision Flexographic Press (EP-D3)	Water-based		<25%
Rotogravure Unit #1 (EP-D4)	Water-based	65 tons/yr ^{(2) (3)}	<25%
Rotogravure Unit #2 (EP-D5)	Water-based		<25%
W & H Flexographic Press (EP-D6)	Water-based		<25%

Notes:

- (1). VOC usage shall be monitored and recorded as required in this section by multiplying the amount of each material used and the VOC content of the material.
- (2). Total VOC usage for emission points EP-D2, EP-D3, EP-D4, EP-D5 & EP-D6 shall not exceed 65 tons/yr.
- (3). VOC usage restrictions in tons/yr refer to a twelve-month rolling total.
- (4). Water-based materials shall be defined as any material with a VOC content less than 25% (by weight).
- A. When solvent-based materials are used the emissions shall be vented to the thermal oxidizer (EP-D/DB) before being exhausted to the atmosphere. Solvent-based materials shall be defined as any material with a VOC content greater than or equal to 25% (by weight). When water-based materials are used emissions may be vented directly to the atmosphere (via EP-D2, EP-D3, EP-D4, EP-D5 &/or EP-D6).
- B. The maximum capacity of the Laminator Unit #1 Dryer, Vision Flexographic Dryer, Rotogravure Unit #1 Dryer, Rotogravure Unit #2 Dryer and Flexographic Dryer shall not exceed 1.6 MMBTU/HR (each).

- C. The capture system for VOC emissions from EP-D2, EP-D3 & EP-D6 shall be designed for a minimum capture efficiency of 85% of VOCs from solvent based coating.
- D. The capture system for VOC emissions from EP-D4 & EP-D5 shall be designed for a capture efficiency of 100% of VOCs from solvent based coating.
- E. Fuel usage shall be limited to natural gas only.
- F. This facility (plant number 85-03-003) is subject to all applicable operating limits set forth in 40 CFR Part 63 Subpart A (General Provisions) and 40 CFR Part 63 Subpart KK (National Emission Standards for the Printing and Publishing Industry). See Plant-Wide Conditions section (page 9) for details.

Reporting & Record keeping:

Records shall be maintained on site for five (5) years and be available for inspection upon request by representatives of the Department of Natural Resources. These records shall show the following:

- A. The VOC usage shall be determined by multiplying the monthly usage of each material by its VOC content. After each month these units are used, the twelve-month rolling total shall be calculated and updated.
- B. Material Safety Data Sheets (MSDS) for each material used in any of the units.
- C. This facility (plant number 85-03-003) is subject to all applicable monitoring and/or recordkeeping requirements as set forth in 40 CFR Part 63 Subpart A (General Provisions) and 40 CFR Part 63 Subpart KK (National Emission Standards for the Printing and Publishing Industry).

Authority for Requirement: Iowa DNR Construction Permits 96-A-559-S4, 97-A-429-S3, 99-A-346-S2, 99-A-347-S2, and 97-A-430-S4

Emission Point Characteristics

The emission points shall conform to the specifications listed below.

Table 4 – Stacks			Stack Characteristics				
EP	EU	Construction Permit #	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Exhaust Temp. (°F)	Exhaust Flowrate (scfm)
EP-D2	LAM01-A	96-A-559-S4	48.5	Vertical	24	150 -	5,300
	LAM01-D			Unobstructed		200	3,300
EP-D3	FLX7719-A	97-A-429-S3	47.3	Vertical	20	150 -	2,100
	FLX7719-D			Unobstructed		200	
EP-D4	RG01-A	99-A-346-S2	47.3	Vertical Unobstructed	20	150 -	2,500
	RG01-D					200	2,300
EP-D5	RG02-A	99-A-347-S2	46.9	Vertical	20	150 -	2,500
	RG02-D			Unobstructed		200	2,300
EP-D6	FLX41.569-A	97-A-430-S4	50.2	Vertical	20	150 -	5,000
	FLX41.569-D	71-A-43U-34	30.2	Unobstructed	20	200	3,000

Authority for Requirement: Iowa DNR Construction Permits Referenced in Table 4.

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes \(\subseteq\) No \(\subseteq\)
Facility Maintained Operation & Maintenance Plan Required? Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required? Yes No
Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: EP-E and EP-FAC (Vent Internally)

Associated Equipment

Table 1 - Units

EP	EU	EU Description	Raw Material/ Fuel	Rated Capacity
	KOP124	KOP Bag Machine No. 24 –	Inks and	13.45 lb/hr;
		Surface Paper Coating	Adhesives	289.2 lb/hr
	KOP127	KOP Bag Machine No. 27 –	Inks and	13.45 lb/hr;
		Surface Paper Coating	Adhesives	289.2 lb/hr
EP-E	KOP128	KOP Bag Machine No. 28 –	Inks and	13.45 lb/hr;
L:F -L:		Surface Paper Coating	Adhesives	289.2 lb/hr
	KOS401	KOS No. 1 – Surface Paper Coating	Adhesives	0.09 lb/hr
	KSL001	KSL No. 1	Adhesives	2.0 lb/hr
	MBD501	MBD No. 501	Adhesives	9.87 lb/hr
EP-FAC	FAC	Escility Cleanun Salvant Has	Cleanup	
		Facility Cleanup Solvent Use (Preformed Products Division)	Solvents,	2.7 lb/hr
		(Fierorinea Froducts Division)	Blanket Wash	

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Volatile Organic Compounds (VOCs)

Emission Limit(s) 4.33 tpy (1)

Authority for Requirement: Iowa DNR Construction Permits 94-A-601-S6

(1) Refer to Operating Limits section for material usage restrictions that result in the 4.33 tons of VOC per year limit for the emission point.

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

NESHAP Applicability

The emission units covered under this permit are subject to 40 CFR Part 63 Subpart KK, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Printing and Publishing Industry (§63.820). These emission units are also subject to the provisions of 40 CFR Part 63 Subpart A- *General Provisions*. See Plant-Wide Conditions section (page 9) for details.

Operating Limits:

- A. The maximum amounts of VOCs used in all raw materials on all KOS units, all KSL Units, all MBD Units, and all KOP Bag Machines, shall not exceed 2.20 tons per twelve-month rolling total.
- B. The maximum amount of VOCs in all cleanup and blanket wash solvents used in this facility shall not exceed 2.13 tons per twelve-month rolling total.

Reporting & Record keeping:

Records shall be maintained on site for five (5) years and be available for inspection upon request by representatives of the Department of Natural Resources. These records shall show the following:

- A. The VOC usage shall be determined by multiplying the monthly usage of each material by its VOC content. After each month these units are used, the twelve-month rolling total shall be calculated and updated.
- B. Material Safety Data Sheets (MSDS) for each material used in any of the units.

Authority for Requirement: Iowa DNR Construction Permit 94-A-601-S6

Emission Point Characteristics

This emission point (EP-E) does not vent to the atmosphere.

The following emission units are considered to vent to emission point EP-E:

Emission Unit Description	Maximum Capacity
KOP Bag Machine No. 24 (EU KOP124)	13.5 lb/hr (ink); 289.2 lb/hr (adhesive)
KOP Bag Machine No. 27 (EU KOP127)	13.5 lb/hr (ink); 289.2 lb/hr (adhesive)
KOP Bag Machine No. 28 (EU KOP128)	13.5 lb/hr (ink); 289.2 lb/hr (adhesive)
KOS No. 1 (EU KOS410)	0.1 lb/hr (adhesive)
KSL No. 1 (EU KSL001)	2.0 lb/hr (adhesive)
MBD No. 501 (EU MBD501)	9.9 lb/hr (adhesive)

Authority for Requirement: Iowa DNR Construction Permit 94-A-601-S6

Monitoring Requirements
The owner/operator of this equipment shall comply with the monitoring requirements listed
below.
Agency Approved Operation & Maintenance Plan Required? Yes No
Facility Maintained Operation & Maintenance Plan Required? Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required? Yes \square No \boxtimes
Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: EP-FPL and EP-RENZROOM

Associated Equipment

Table 1 - Units

EP	EU	EU Description	Raw Material/ Fuel	Rated Capacity
EP-FPL ⁽¹⁾	FP&L	FP&L Division Cleanup Solvent Use	Cleanup Solvents	3,715 lb/hr
EP-RENZ	RENZROOM	Renzmann Parts Washer	Cleanup Solvents	1.55 lb/hr

⁽¹⁾ Vent Internally.

Applicable Requirements

Table 2 – Emission Limits

EP	EU	VOC	Authority for Requirement: Iowa DNR Construction Permit
EP-FPL	FP&L	22.3 $tpy^{(1,2)}$	98-A-870-S2
EP-RENZ	RENZROOM	N/A	90-A-070-32

⁽¹⁾ Standard is a 12-month rolling total.

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Operating Limits:

- A. The maximum amount of VOCs used in the FP&L Solvent Use (Note: this is a fugitive emission) shall not exceed 22.3 tons per year.
- B. This facility (plant number 85-03-003) is subject to all applicable operating limits set forth in 40 CFR Part 63 Subpart A (General Provisions) and 40 CFR Part 63 Subpart KK (National Emission Standards for the Printing and Publishing Industry). See Plant-Wide Conditions section (page 9) for details.

Reporting & Record keeping:

Records shall be maintained on site for five (5) years and be available for inspection upon request by representatives of the Department of Natural Resources. These records shall show the following:

- A. For the first twelve (12) months of operation, determine the total amount of VOCs (in tons/mo) used by the FP&L Solvent Use for each month of operation.
- B. After the first twelve (12) months of operation, determine the cumulative amount of VOCs (in tons/yr) used by the FP&L Solvent Use on a 12-month total, rolled monthly.

⁽²⁾ This limit is FP&L solvent use.

- C. Material Safety Data Sheets (MSDS) of all materials used in the Renzman Parts Washer and for the FP&L Solvent Use.
- D. This facility (plant number 85-03-003) is subject to all applicable monitoring and/or recordkeeping requirements as set forth in 40 CFR Part 63 Subpart A (General Provisions) and 40 CFR Part 63 Subpart KK (National Emission Standards for the Printing and Publishing Industry).

Authority for Requirement: Iowa DNR Construction Permit 98-A-870-S2

Emission Point Characteristics

The emission point EP-RENZ shall conform to the specifications listed below.

Stack Height (feet, from the ground): 40.6

Stack Opening (inches, dia): 18 Exhaust Temperature (°F): 70 Exhaust Flowrate (scfm): 5,000

Discharge Style: Vertical Unobstructed

Authority for Requirement: Iowa DNR Construction Permit 98-A-870-S2

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes \sum No \infty
Facility Maintained Operation & Maintenance Plan Required? Yes No
Compliance Assurance Monitoring (CAM) Plan Required? Yes No No
Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: EP-H1 through EP-H7

Associated Equipment

Table 1 - Units

EP	EU	EU Description	Raw Material/Fuel	Rated Capacity
EP-H1	CT01	Corona Treater No. 1 (Located on FLX7660)	Electricity, Paper	5 kW
EP-H2	CT02	Corona Treater No. 2 (Located on FLX7719)	Electricity, Paper	5 kW
EP-H3	CT03	Corona Treater No. 3 (Located on FLX7719)	Electricity, Paper	5 kW
EP-H4	CT04	Corona Treater No. 4 (Located on LAM01)	Electricity, Paper	5 kW
EP-H5	CT05	Corona Treater No. 5 (Located on LAM01)	Electricity, Paper	5 kW
EP-H6	CT06	Corona Treater No. 6 (Located on FLX41.569)	Electricity, Paper	10 kW
EP-H7	CT07	Corona Treater No. 7	Electricity, Paper	7.5 kW

Applicable Requirements

Table 2 – Emission Limits

EP	EU	Ozone (lb/hr)	Authority for Requirement: IDNR Construction Permit #
EP-H1	CT01	0.37	00-A-784-S1
EP-H2	CT02	0.37	00-A-785-S1
EP-H3	CT03	0.37	00-A-786-S1
EP-H4	CT04	0.37	00-A-787-S1
EP-H5	CT05	0.37	00-A-788-S1
EP-H6	CT06	0.73	00-A-789-S4
EP-H7	CT07	0.55	01-A-188-S2

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

None at this time.

Emission Point Characteristics

The emission points shall conform to the specifications listed below.

Table 3 – Stacks			Stack Characteristics				
EP	EU	Construction Permit #	Stack Height (feet, above ground)	Discharge Style	Stack Opening (inches, dia.)	Exhaust Temp. (°F)	Exhaust Flowrate (scfm)
EP-H1	CT01	00-A-784-S1	40.9	Vertical unobstructed	6	130	700
EP-H2	CT02	00-A-785-S1	42.0	Vertical unobstructed	8	130	700
ЕР-Н3	CT03	00-A-786-S1	42.0	Vertical unobstructed	8	130	700
EP-H4	CT04	00-A-787-S1	40.6	Vertical unobstructed	8	130	700
EP-H5	CT05	00-A-788-S1	40.3	Vertical unobstructed	8	130	700
EP-H6	CT06	00-A-789-S4	48.8	Vertical unobstructed	8	130	700
EP-H7	CT07	01-A-188-S2	50.9	Vertical unobstructed	6	130	1,100

Authority for Requirement: Iowa DNR Construction Permits Referenced in Table 3.

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes \sum No \subseteq
Facility Maintained Operation & Maintenance Plan Required? Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required? Yes 🗌 No 🖂
Authority for Requirement: 567 IAC 22.108(3)

Emission Point ID Number: EP-L

Associated Equipment

Associated Emission Unit ID Number: LAM02

Emission Unit Vented through this Emission Point: LAM02

Emission Unit Description: Laminator No. 2 Raw Material/Fuel: Solventless adhesives

Rated Capacity: 195 lb/hr

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40% (1)

Authority for Requirement: 567 IAC 23.3(2)"a" (Iowa DNR Construction Permits 01-A-189-S2)

(1) An exceedance of the indicator opacity of (25%) will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If the exceedance continues after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM) Emission Limit(s): 0.1 gr/dscf

Authority for Requirement: 567 IAC 23.3(2)"a" (Iowa DNR Construction Permits 01-A-189-S2)

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

NESHAP Applicability

The emission units covered under this permit are subject to 40 CFR Part 63 Subpart KK, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Printing and Publishing Industry (§63.820). These emission units are also subject to the provisions of 40 CFR Part 63 Subpart A- *General Provisions*. See Plant-Wide Conditions section (page 9) for details.

Operating Limits:

A. The laminator shall use VOC-free adhesive materials.

Reporting & Record keeping:

Records shall be maintained on site for five (5) years and be available for inspection upon request by representatives of the Department of Natural Resources. These records shall show the following:

A. Maintain MSDS sheets of all adhesive materials used.

Authority for Requirement: Iowa DNR Construction Permits 01-A-189-S2

Emission Point Characteristics

This emission point shall conform to the specifications listed below.

Stack Height (feet, from ground): 47.3 Discharge Style: Vertical unobstructed Stack Opening, (inches, dia.): 12

Stack Exhaust Flow Rate (scfm): 1,200 Stack Temperature (°F): Ambient

Authority for Requirement: Iowa DNR Construction Permits 01-A-189-S2

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required? Yes 🗌 No 🗵
Compliance Assurance Monitoring (CAM) Plan Required? Yes 🗌 No 🖂
Authority for Requirement: 567 IAC 22.108(3)

IV. General Conditions

This permit is issued under the authority of the Iowa Code subsection 455B.133(8) and in accordance with 567 Iowa Administrative Code chapter 22.

G1. Duty to Comply

- 1. The permittee must comply with all conditions of the Title V permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. 567 IAC 22.108(9)"a"
- 2. Any compliance schedule shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based. 567 IAC 22.105 (2)"h"(3)
- 3. Where an applicable requirement of the Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions shall be enforceable by the administrator and are incorporated into this permit. 567 IAC 22.108 (1)"b"
- 4. Unless specified as either "state enforceable only" or "local program enforceable only", all terms and conditions in the permit, including provisions to limit a source's potential to emit, are enforceable by the administrator and citizens under the Act. 567 IAC 22.108 (14)
- 5. It shall not be a defense for a permittee, in an enforcement action, that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. 567 IAC 22.108 (9)"b"

G2. Permit Expiration

- 1. Except as provided in 567 IAC 22.104, the expiration of this permit terminates the permittee's right to operate unless a timely and complete application has been submitted for renewal. Any testing required for renewal shall be completed before the application is submitted. 567 IAC 22.116(2)
- 2. To be considered timely, the owner, operator, or designated representative (where applicable) of each source required to obtain a Title V permit shall present or mail the Air Quality Bureau, Iowa Department of Natural Resources, Air Quality Bureau, 7900 Hickman Rd, Suite #1, Urbandale, Iowa 50322, two copies (three if your facility is located in Linn or Polk county) of a complete permit application, at least 6 months but not more than 18 months prior to the date of permit expiration. An additional copy must also be sent to EPA Region VII, Attention: Chief of Air Permits, 901 N. 5th St., Kansas City, KS 66101. The application must include all emission points, emission units, air pollution control equipment, and monitoring devices at the facility. All emissions generating activities, including fugitive emissions, must be included. The definition of a complete application is as indicated in 567 IAC 22.105(2). 567 IAC 22.105

G3. Certification Requirement for Title V Related Documents

Any application, report, compliance certification or other document submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. All certifications shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. 567 IAC 22.107 (4)

G4. Annual Compliance Certification

By March 31 of each year, the permittee shall submit compliance certifications for the previous calendar year. The certifications shall include descriptions of means to monitor the compliance status of all emissions sources including emissions limitations, standards, and work practices in accordance with applicable requirements. The certification for a source shall include the identification of each term or condition of the permit that is the basis of the certification; the

compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with all applicable department rules. For sources determined not to be in compliance at the time of compliance certification, a compliance schedule shall be submitted which provides for periodic progress reports, dates for achieving activities, milestones, and an explanation of why any dates were missed and preventive or corrective measures. The compliance certification shall be submitted to the administrator, director, and the appropriate DNR Field office. 567 IAC 22.108 (15)"e"

G5. Semi-Annual Monitoring Report

By March 31 and September 30 of each year, the permittee shall submit a report of any monitoring required under this permit for the 6 month periods of July 1 to December 31 and January 1 to June 30, respectively. All instances of deviations from permit requirements must be clearly identified in these reports, and the report must be signed by a responsible official, consistent with 567 IAC 22.107(4). The semi-annual monitoring report shall be submitted to the director and the appropriate DNR Field office. 567 IAC 22.108 (5)

G6. Annual Fee

- 1. The permittee is required under subrule 567 IAC 22.106 to pay an annual fee based on the total tons of actual emissions of each regulated air pollutant. Beginning July 1, 1996, Title V operating permit fees will be paid on July 1 of each year. The fee shall be based on emissions for the previous calendar year.
- 2. The fee amount shall be calculated based on the first 4,000 tons of each regulated air pollutant emitted each year. The fee to be charged per ton of pollutant will be available from the department by June 1 of each year. The Responsible Official will be advised of any change in the annual fee per ton of pollutant.
- 3. The following forms shall be submitted annually by March 31 documenting actual emissions for the previous calendar year.
 - a. Form 1.0 "Facility Identification";
 - b. Form 4.0 "Emissions unit-actual operations and emissions" for each emission unit;
 - c. Form 5.0 "Title V annual emissions summary/fee"; and
 - d. Part 3 "Application certification."
- 4. The fee shall be submitted annually by July 1. The fee shall be submitted with the following forms:
 - a. Form 1.0 "Facility Identification";
 - b. Form 5.0 "Title V annual emissions summary/fee";
 - c. Part 3 "Application certification."
- 5. If there are any changes to the emission calculation form, the department shall make revised forms available to the public by January 1. If revised forms are not available by January 1, forms from the previous year may be used and the year of emissions documented changed. The department shall calculate the total statewide Title V emissions for the prior calendar year and make this information available to the public no later than April 30 of each year.
- 6. Phase I acid rain affected units under section 404 of the Act shall not be required to pay a fee for emissions which occur during the years 1993 through 1999 inclusive.
- 7. The fee for a portable emissions unit or stationary source which operates both in Iowa and out of state shall be calculated only for emissions from the source while operating in Iowa.
- 8. Failure to pay the appropriate Title V fee represents cause for revocation of the Title V permit as indicated in 567 IAC 22.115(1)"d".

G7. Inspection of Premises, Records, Equipment, Methods and Discharges

Upon presentation of proper credentials and any other documents as may be required by law, the permittee shall allow the director or the director's authorized representative to:

- 1. Enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- 2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- 3. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- 4. Sample or monitor, at reasonable times, substances or parameters for the purpose of ensuring compliance with the permit or other applicable requirements. 567 IAC 22.108 (15)"b"

G8. Duty to Provide Information

The permittee shall furnish to the director, within a reasonable time, any information that the director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the director copies of records required to be kept by the permit, or for information claimed to be confidential, the permittee shall furnish such records directly to the administrator of EPA along with a claim of confidentiality. 567 IAC 22.108 (9)"e"

G9. General Maintenance and Repair Duties

The owner or operator of any air emission source or control equipment shall:

- 1. Maintain and operate the equipment or control equipment at all times in a manner consistent with good practice for minimizing emissions.
- 2. Remedy any cause of excess emissions in an expeditious manner.
- 3. Minimize the amount and duration of any excess emission to the maximum extent possible during periods of such emissions. These measures may include but not be limited to the use of clean fuels, production cutbacks, or the use of alternate process units or, in the case of utilities, purchase of electrical power until repairs are completed.
- 4. Schedule, at a minimum, routine maintenance of equipment or control equipment during periods of process shutdowns to the maximum extent possible. 567 IAC 24.2(1)

G10. Recordkeeping Requirements for Compliance Monitoring

- 1. In addition to any source specific recordkeeping requirements contained in this permit, the permittee shall maintain the following compliance monitoring records, where applicable:
 - a. The date, place and time of sampling or measurements
 - b. The date the analyses were performed.
 - c. The company or entity that performed the analyses.
 - d. The analytical techniques or methods used.
 - e. The results of such analyses; and
 - f. The operating conditions as existing at the time of sampling or measurement.
 - g. The records of quality assurance for continuous compliance monitoring systems (including but not limited to quality control activities, audits and calibration drifts.)
- 2. The permittee shall retain records of all required compliance monitoring data and support information for a period of at least 5 years from the date of compliance monitoring sample, measurement report or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous compliance monitoring, and copies of all reports required by the permit.

- 3. For any source which in its application identified reasonably anticipated alternative operating scenarios, the permittee shall:
 - a. Comply with all terms and conditions of this permit specific to each alternative scenario.
 - b. Maintain a log at the permitted facility of the scenario under which it is operating.
 - c. Consider the permit shield, if provided in this permit, to extend to all terms and conditions under each operating scenario. 567 IAC 22.108(4), 567 IAC 22.108(12)

G11. Evidence used in establishing that a violation has or is occurring.

Notwithstanding any other provisions of these rules, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions herein.

1. Information from the use of the following methods is presumptively credible evidence of

- 1. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at a source:
 - a. A monitoring method approved for the source and incorporated in an operating permit pursuant to 567 Chapter 22;
 - b. Compliance test methods specified in 567 Chapter 25; or
 - c. Testing or monitoring methods approved for the source in a construction permit issued pursuant to 567 Chapter 22.
- 2. The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a. Any monitoring or testing methods provided in these rules; or
 - b. Other testing, monitoring, or information gathering methods that produce information comparable to that produced by any method in subrule 21.5(1) or this subrule. 567 IAC 21.5(1)-567 IAC 21.5(2)

G12. Prevention of Accidental Release: Risk Management Plan Notification and Compliance Certification

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Act, the permittee shall notify the department of this requirement. The plan shall be filed with all appropriate authorities by the deadline specified by EPA. A certification that this risk management plan is being properly implemented shall be included in the annual compliance certification of this permit. 567 IAC 22.108(6)

G13. Hazardous Release

The permittee must report any situation involving the actual, imminent, or probable release of a hazardous substance into the atmosphere which, because of the quantity, strength and toxicity of the substance, creates an immediate or potential danger to the public health, safety or to the environment. A verbal report shall be made to the department at (515) 281-8694 and to the local police department or the office of the sheriff of the affected county as soon as possible but not later than six hours after the discovery or onset of the condition. This verbal report must be followed up with a written report as indicated in 567 IAC 131.2(2). 567 IAC Chapter 131-State Only

G14. Excess Emissions and Excess Emissions Reporting Requirements

1. Excess Emissions. Excess emission during a period of startup, shutdown, or cleaning of control equipment is not a violation of the emission standard if the startup, shutdown or cleaning is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions. Cleaning of control equipment which does not require the shutdown of the process equipment shall be limited to one six-minute period per one-hour period. An incident of excess emission (other than an incident during startup, shutdown or cleaning of control equipment) is a

violation. If the owner or operator of a source maintains that the incident of excess emission was due to a malfunction, the owner or operator must show that the conditions which caused the incident of excess emission were not preventable by reasonable maintenance and control measures. Determination of any subsequent enforcement action will be made following review of this report. If excess emissions are occurring, either the control equipment causing the excess emission shall be repaired in an expeditious manner or the process generating the emissions shall be shutdown within a reasonable period of time. An expeditious manner is the time necessary to determine the cause of the excess emissions and to correct it within a reasonable period of time. A reasonable period of time is eight hours plus the period of time required to shut down the process without damaging the process equipment or control equipment. In the case of an electric utility, a reasonable period of time is eight hours plus the period of time until comparable generating capacity is available to meet consumer demand with the affected unit out of service, unless, the director shall, upon investigation, reasonably determine that continued operation constitutes an unjustifiable environmental hazard and issue an order that such operation is not in the public interest and require a process shutdown to commence immediately.

2. Excess Emissions Reporting

- a. Oral Reporting of Excess Emissions. An incident of excess emission (other than an incident of excess emission during a period of startup, shutdown, or cleaning) shall be reported to the appropriate field office of the department within eight hours of, or at the start of the first working day following the onset of the incident. The reporting exemption for an incident of excess emission during startup, shutdown or cleaning does not relieve the owner or operator of a source with continuous monitoring equipment of the obligation of submitting reports required in 567-subrule 25.1(6). An oral report of excess emission is not required for a source with operational continuous monitoring equipment (as specified in 567-subrule 25.1(1)) if the incident of excess emission continues for less than 30 minutes and does not exceed the applicable emission standard by more than 10 percent or the applicable visible emission standard by more than 10 percent opacity. The oral report may be made in person or by telephone and shall include as a minimum the following:
 - i. The identity of the equipment or source operation from which the excess emission originated and the associated stack or emission point.
 - ii. The estimated quantity of the excess emission.
 - iii. The time and expected duration of the excess emission.
 - iv. The cause of the excess emission.
 - v. The steps being taken to remedy the excess emission.
 - vi. The steps being taken to limit the excess emission in the interim period.
- b. Written Reporting of Excess Emissions. A written report of an incident of excess emission shall be submitted as a follow-up to all required oral reports to the department within seven days of the onset of the upset condition, and shall include as a minimum the following:
 - i. The identity of the equipment or source operation point from which the excess emission originated and the associated stack or emission point.
 - ii. The estimated quantity of the excess emission.
 - iii. The time and duration of the excess emission.
 - iv. The cause of the excess emission.
 - v. The steps that were taken to remedy and to prevent the recurrence of the

incident of excess emission.

- vi. The steps that were taken to limit the excess emission.
- vii. If the owner claims that the excess emission was due to malfunction, documentation to support this claim. 567 IAC 24.1(1)-567 IAC 24.1(4)
- 3. Emergency Defense for Excess Emissions. For the purposes of this permit, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include non-compliance, to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation or operator error. An emergency constitutes an affirmative defense to an action brought for non-compliance with technology based limitations if it can be demonstrated through properly signed contemporaneous operating logs or other relevant evidence that:
 - a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - b. The facility at the time was being properly operated;
 - c. During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements of the permit; and
 - d. The permittee submitted notice of the emergency to the director by certified mail within two working days of the time when the emissions limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. 567 IAC 22.108(16)

G15. Permit Deviation Reporting Requirements

A deviation is any failure to meet a term, condition or applicable requirement in the permit. Reporting requirements for deviations that result in a hazardous release or excess emissions have been indicated above (see G13 and G14). Unless more frequent deviation reporting is specified in the permit, any other deviation shall be documented in the semi-annual monitoring report and the annual compliance certification (see G4 and G5). 567 IAC 22.108(5)"b"

G16. Notification Requirements for Sources That Become Subject to NSPS and NESHAP Regulations

During the term of this permit, the permittee must notify the department of any source that becomes subject to a standard or other requirement under 567-subrule 23.1(2) (standards of performance of new stationary sources) or section 111 of the Act; or 567-subrule 23.1(3) (emissions standards for hazardous air pollutants), 567-subrule 23.1(4) (emission standards for hazardous air pollutants for source categories) or section 112 of the Act. This notification shall be submitted in writing to the department pursuant to the notification requirements in 40 CFR Section 60.7, 40 CFR Section 61.07, and/or 40 CFR Section 63.9. 567 IAC 23.1(2), 567 IAC 23.1(4)

G17. Requirements for Making Changes to Emission Sources That Do Not Require Title V Permit Modification

- 1. Off Permit Changes to a Source. Pursuant to section 502(b)(10) of the CAAA, the permittee may make changes to this installation/facility without revising this permit if:
 - a. The changes are not major modifications under any provision of any program required by section 110 of the Act, modifications under section 111 of the act, modifications under

- section 112 of the act, or major modifications as defined in 567 IAC Chapter 22.
- b. The changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions);
- c. The changes are not modifications under any provisions of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or as total emissions);
- d. The changes are not subject to any requirement under Title IV of the Act.
- e. The changes comply with all applicable requirements.
- f. For such a change, the permitted source provides to the department and the administrator by certified mail, at least 30 days in advance of the proposed change, a written notification, including the following, which must be attached to the permit by the source, the department and the administrator:
 - i. A brief description of the change within the permitted facility,
 - ii. The date on which the change will occur,
 - iii. Any change in emission as a result of that change,
 - iv. The pollutants emitted subject to the emissions trade
 - v. If the emissions trading provisions of the state implementation plan are invoked, then Title V permit requirements with which the source shall comply; a description of how the emissions increases and decreases will comply with the terms and conditions of the Title V permit.
 - vi. A description of the trading of emissions increases and decreases for the purpose of complying with a federally enforceable emissions cap as specified in and in compliance with the Title V permit; and
 - vii. Any permit term or condition no longer applicable as a result of the change. $567 \, IAC \, 22.110(1)$
- 2. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), record keeping, reporting, or compliance certification requirements. 567 IAC 22.110(2)
- 3. Notwithstanding any other part of this rule, the director may, upon review of a notice, require a stationary source to apply for a Title V permit if the change does not meet the requirements of subrule 22.110(1). 567 IAC 22.110(3)
- 4. The permit shield provided in subrule 22.108(18) shall not apply to any change made pursuant to this rule. Compliance with the permit requirements that the source will meet using the emissions trade shall be determined according to requirements of the state implementation plan authorizing the emissions trade. 567 IAC 22.110(4)
- 5. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes, for changes that are provided for in this permit. 567 IAC 22.108(11)

G18. Duty to Modify a Title V Permit

- 1. Administrative Amendment.
 - a. An administrative permit amendment is a permit revision that is required to do any of the following:
 - i. Correct typographical errors
 - ii. Identify a change in the name, address, or telephone number of any person identified in the permit, or provides a similar minor administrative change at the

source:

- iii. Require more frequent monitoring or reporting by the permittee; or iv. Allow for a change in ownership or operational control of a source where the director determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new permittee has been submitted to the director.
- b. The permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. The request shall be submitted to the director.
- c. Administrative amendments to portions of permits containing provisions pursuant to Title IV of the Act shall be governed by regulations promulgated by the administrator under Title IV of the Act.
- 2. Minor Permit Modification.
 - a. Minor permit modification procedures may be used only for those permit modifications that do any of the following:
 - i. Do not violate any applicable requirements
 - ii. Do not involve significant changes to existing monitoring, reporting or recordkeeping requirements in the Title V permit.
 - iii. Do not require or change a case by case determination of an emission limitation or other standard, or increment analysis.
 - iv. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed in order to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include any federally enforceable emissions caps which the source would assume to avoid classification as a modification under any provision under Title I of the Act; and an alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Act.;
 - v. Are not modifications under any provision of Title I of the Act; and
 - vi. Are not required to be processed as significant modification.
 - b. An application for minor permit revision shall be on the minor Title V modification application form and shall include at least the following:
 - i. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs.
 - ii. The permittee's suggested draft permit
 - iii. Certification by a responsible official, pursuant to 567 IAC 22.107(4), that the proposed modification meets the criteria for use of a minor permit modification procedures and a request that such procedures be used; and
 - iv. Completed forms to enable the department to notify the administrator and the affected states as required by 567 IAC 22.107(7).
 - c. The permittee may make the change proposed in its minor permit modification application immediately after it files the application. After the permittee makes this change and until the director takes any of the actions specified in 567 IAC 22.112(4) "a" to "c", the permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time, the permittee

need not comply with the existing permit terms and conditions it seeks to modify. However, if the permittee fails to comply with its proposed permit terms and conditions during this time period, existing permit term terms and conditions it seeks to modify may subject the facility to enforcement action.

3. Significant Permit Modification. Significant Title V modification procedures shall be used for applications requesting Title V permit modifications that do not qualify as minor Title V modifications or as administrative amendments. These include but are not limited to all significant changes in monitoring permit terms, every relaxation of reporting or recordkeeping permit terms, and any change in the method of measuring compliance with existing requirements. Significant Title V modifications shall meet all requirements of 567 IAC Chapter 22, including those for applications, public participation, review by affected states, and review by the administrator, and those requirements that apply to Title V issuance and renewal. 567 IAC 22.111-567 IAC 22.113 The permittee shall submit an application for a significant permit modification not later than three months after commencing operation of the changed source unless the existing Title V permit would prohibit such construction or change in operation, in which event the operation of the changed source may not commence until the department revises the permit. 567 IAC 22.105(1)"a"(4)

G19. Duty to Obtain Construction Permits

Unless exempted under 567 IAC 22.1(2), the permittee must not construct, install, reconstruct, or alter any equipment, control equipment or anaerobic lagoon without first obtaining a construction permit, conditional permit, or permit pursuant to 567 IAC 22.8, or permits required pursuant to 567 IAC 22.4 and 567 IAC 22.5. Such permits shall be obtained prior to the initiation of construction, installation or alteration of any portion of the stationary source. 567 IAC 22.1(1) **G20. Asbestos**

The permittee shall comply with 567 IAC 23.1(3)"a", and 567 IAC 23.2(3)"g" when activities involve asbestos mills, surfacing of roadways, manufacturing operations, fabricating, insulating, waste disposal, spraying applications, demolition and renovation operations, training fires and controlled burning of a demolished building. 567 IAC 23.1(3)"a", and 567 IAC 23.2

G21. Open Burning

The permittee is prohibited from conducting open burning, except as may be allowed by 567 IAC 23.2. 567 IAC 23.2 except 23.2(3)"h"; 567 IAC 23.2(3)"h" - State Only

G22. Acid Rain (Title IV) Emissions Allowances

The permittee shall not exceed any allowances that it holds under Title IV of the Act or the regulations promulgated there under. Annual emissions of sulfur dioxide in excess of the number of allowances to emit sulfur dioxide held by the owners and operators of the unit or the designated representative of the owners and operators is prohibited. Exceedences of applicable emission rates are prohibited. "Held" in this context refers to both those allowances assigned to the owners and operators by USEPA, and those allowances supplementally acquired by the owners and operators. The use of any allowance prior to the year for which it was allocated is prohibited. Contravention of any other provision of the permit is prohibited. 567 IAC 22.108(7)

G23. Stratospheric Ozone and Climate Protection (Title VI) Requirements

- 1. The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a. All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into

interstate commerce pursuant to § 82.106.

- b. The placement of the required warning statement must comply with the requirements pursuant to § 82.108.
- c. The form of the label bearing the required warning statement must comply with the requirements pursuant to § 82.110.
- d. No person may modify, remove, or interfere with the required warning statement except as described in § 82.112.
- 2. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:
 - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158.
 - c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161.
 - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with reporting and recordkeeping requirements pursuant to § 82.166. ("MVAC-like appliance" as defined at § 82.152)
 - e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to § 82.156.
 - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.
- 3. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant,
- 5. The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. 40 CFR part 82

G24. Permit Reopenings

- 1. This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. 567 IAC 22.108(9)"c"
- 2. Additional applicable requirements under the Act become applicable to a major part 70 source with a remaining permit term of 3 or more years. Revisions shall be made as expeditiously as

practicable, but not later than 18 months after the promulgation of such standards and regulations.

- a. Reopening and revision on this ground is <u>not</u> required if the permit has a remaining term of less than three years;
- b. Reopening and revision on this ground is <u>not</u> required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to 40 CFR 70.4(b)(10)(i) or (ii) as amended to June 25, 1993.
- c. Reopening and revision on this ground is <u>not</u> required if the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. 567 IAC 22.108(17)"a", 567 IAC 22.108(17)"b"
- 3. A permit shall be reopened and revised under any of the following circumstances:
 - a. The department receives notice that the administrator has granted a petition for disapproval of a permit pursuant to 40 CFR 70.8(d) as amended to June 25, 1993, provided that the reopening may be stayed pending judicial review of that determination; b. The department or the administrator determines that the Title V permit contains a
 - b. The department or the administrator determines that the Title V permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Title V permit;
 - c. Additional applicable requirements under the Act become applicable to a Title V source, provided that the reopening on this ground is not required if the permit has a remaining term of less than three years, the effective date of the requirement is later than the date on which the permit is due to expire, or the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. Such a reopening shall be complete not later than 18 months after promulgation of the applicable requirement.
 - d. Additional requirements, including excess emissions requirements, become applicable to a Title IV affected source under the acid rain program. Upon approval by the administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
 - e. The department or the administrator determines that the permit must be revised or revoked to ensure compliance by the source with the applicable requirements. 567 IAC 22.114(1)
- 4. Proceedings to reopen and reissue a Title V permit shall follow the procedures applicable to initial permit issuance and shall effect only those parts of the permit for which cause to reopen exists. 567 IAC 22.114(2)

G25. Permit Shield

- 1. The director may expressly include in a Title V permit a provision stating that compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:
- a. Such applicable requirements are included and are specifically identified in the permit; or b. The director, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.
- 2. A Title V permit that does not expressly state that a permit shield exists shall be presumed not to provide such a shield.

- 3. A permit shield shall not alter or affect the following:
 - a. The provisions of Section 303 of the Act (emergency orders), including the authority of the administrator under that section;
 - b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the Act:
 - d. The ability of the department or the administrator to obtain information from the facility pursuant to Section 114 of the Act. 567 IAC 22.108 (18)

G26. Severability

The provisions of this permit are severable and if any provision or application of any provision is found to be invalid by this department or a court of law, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected by such finding. 567 IAC 22.108 (8)

G27. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege. 567 IAC 22.108 (9)"d"

G28. Transferability

This permit is not transferable from one source to another. If title to the facility or any part of it is transferred, an administrative amendment to the permit must be sought to determine transferability of the permit. 567 IAC 22.111 (1)"d"

G29. Disclaimer

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. 567 IAC 22.3(3)"c"

G30. Notification and Reporting Requirements for Stack Tests or Monitor Certification The permittee shall notify the department's stack test contact in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor is performed to determine compliance with an applicable requirement. For the department to consider test results a valid demonstration of compliance with applicable rules or a permit condition, such notice shall be given. Such notice shall include the time, the place, the name of the person who will conduct the test and other information as required by the department. Unless specifically waived by the department's stack test contact, a pretest meeting shall be held not later than 15 days prior to conducting the compliance demonstration. The department may accept a testing protocol in lieu of a pretest meeting. A representative of the department shall be permitted to witness the tests. Results of the tests shall be submitted in writing to the department's stack test contact in the form of a comprehensive report within six weeks of the completion of the testing. Compliance tests conducted pursuant to this permit shall be conducted with the source operating in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which the source shall be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the equipment manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the department that the source has been physically altered so that capacity cannot be exceeded, or the department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the department to determine whether such source is in compliance.

Stack test notifications, reports and correspondence shall be sent to:

Stack Test Review Coordinator Iowa DNR, Air Quality Bureau 7900 Hickman Road, Suite #1 Urbandale, IA 50322 (515) 242-6001

Within Polk and Linn Counties, stack test notifications, reports and correspondence shall also be directed to the supervisor of the respective county air pollution program. 567 IAC 25.1(7)"a", 567 IAC 25.1(9)

G31. Prevention of Air Pollution Emergency Episodes

The permittee shall comply with the provisions of 567 IAC Chapter 26 in the prevention of excessive build-up of air contaminants during air pollution episodes, thereby preventing the occurrence of an emergency due to the effects of these contaminants on the health of persons. 567 IAC 26.1(1)

G32. Contacts List

The current address and phone number for reports and notifications to the EPA administrator is:

Chief of Air Permits

EPA Region 7

Air Permits and Compliance Branch

901 N. 5th Street

Kansas City, KS 66101

(913) 551-7020

The current address and phone number for reports and notifications to the department or the Director is:

Chief, Air Quality Bureau

Iowa Department of Natural Resources 7900 Hickman Road, Suite #1 Urbandale, IA 50322 (515) 242-5100

Reports or notifications to the DNR Field Offices or local programs shall be directed to the supervisor at the appropriate field office or local program. Current addresses and phone numbers are:

Field Office 1

909 West Main – Suite 4 Manchester, IA 52057 (563) 927-2640

Field Office 3

1900 N. Grand Ave. Spencer, IA 51301 (712) 262-4177

Field Office 5

401 SW 7th Street, Suite I Des Moines, IA 50309 (515) 725-0268

Polk County Public Works Dept.

Air Quality Division 5885 NE 14th St. Des Moines, IA 50313 (515) 286-3351

Field Office 2

P.O. Box 1443 2300-15th St., SW Mason City, IA 50401 (641) 424-4073

Field Office 4

1401 Sunnyside Lane Atlantic, IA 50022 (712) 243-1934

Field Office 6

1023 West Madison Street Washington, IA 52353-1623 (319) 653-2135

Linn County Public Health Dept.

Air Pollution Control Division 501 13th St., NW Cedar Rapids, IA 52405 (319) 892-6000

V. APPENDIX A

40 CFR 63, Subpart KK National Emission Standards for the Printing and Publishing Industry

[Published on May 30, 1996 and as amended on June 23, 2003]

[The following selected sections and paragraphs of subpart KK are listed here for convenience based on the facility's choice to use less than 10 tons per each rolling 12-month period of each HAP and less than 25 tons per each rolling 12-month period of any combination of HAP at the facility. Please refer to the whole subpart for complete and detailed requirements.]

Subpart KK—National Emission Standards for the Printing and Publishing Industry § 63.820 Applicability.

- (a) The provisions of this subpart apply to:
- (1) Each new and existing facility that is a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.2, at which publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses are operated, and
- (2) each new and existing facility at which publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses are operated for which the owner or operator chooses to commit to, and meets the criteria of paragraphs (a)(2)(i) and (a)(2)(ii) of this section for purposes of establishing the facility to be an area source with respect to this subpart:
- (i) Use less than 9.1 Mg (10 tons) per each rolling 12-month period of each HAP at the facility, including materials used for source categories or purposes other than printing and publishing, and
- (ii) Use less than 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing and publishing.
- (3) Each facility for which the owner or operator chooses to commit to and meets the criteria stated in paragraph (a)(2) of this section shall be considered an area source, and is subject only to the provisions of §63.829(d) and §63.830(b)(1) of this subpart.
- (4) Each facility for which the owner or operator commits to the conditions in paragraph (a)(2) of this section may exclude material used in routine janitorial or facility grounds maintenance, personal uses by employees or other persons, the use of products for the purpose of maintaining electric, propane, gasoline and diesel powered motor vehicles operated by the facility, and the use of HAP contained in intake water (used for processing or noncontact cooling) or intake air (used either as compressed air or for combustion).
- (5) Each facility for which the owner or operator commits to the conditions in paragraph (a)(2) of this section to become an area source, but subsequently exceeds either of the thresholds in paragraph (a)(2) of this section for any rolling 12-month period (without first obtaining and complying with other limits that keep its potential to emit HAP below major source levels), shall be considered in violation of its commitment for that 12-month period and shall be considered a major source of HAP beginning the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, each such facility would be subject to the provisions of this subpart as noted in paragraph (a)(1) of this section and would no longer be eligible to use the provisions of paragraph (a)(2) of this section, even if in subsequent 12-month periods the facility uses less HAP than the thresholds in paragraph (a)(2) of this section.
- (6) An owner or operator of an affected source subject to paragraph (a)(2) of this section who chooses to no longer be subject to paragraph (a)(2) of this section shall notify the Administrator

of such change. If, by no longer being subject to paragraph (a)(2) of this section, the facility at which the affected source is located becomes a major source:

- (i) The owner or operator of an existing source must continue to comply with the HAP usage provisions of paragraph (a)(2) of this section until the source is in compliance with all relevant requirements for existing affected sources under this subpart;
- (ii) The owner or operator of a new source must continue to comply with the HAP usage provisions of paragraph (a)(2) of this section until the source is in compliance with all relevant requirements for new affected sources under this subpart.
- (7) Nothing in this paragraph is intended to preclude a facility from establishing area source status by limiting its potential to emit through other appropriate mechanisms that may be available through the permitting authority.
- (b) This subpart does not apply to research or laboratory equipment.

§ 63.821 Designation of affected sources.

- (a) The affected sources subject to this subpart are:
- (1) All of the publication rotogravure presses and all affiliated equipment, including proof presses, cylinder and parts cleaners, ink and solvent mixing and storage equipment, and solvent recovery equipment at a facility.
- (2) All of the product and packaging rotogravure or wide-web flexographic printing presses at a facility plus any other equipment at that facility which the owner or operator chooses to include in accordance with paragraph (a)(3) of this section, except
- (i) Proof presses, and
- (ii) Any product and packaging rotogravure or wide-web flexographic press which is used primarily for coating, laminating, or other operations which the owner or operator chooses to exclude, provided that
- (A) The sum of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press using product and packaging rotogravure work stations and the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press using wide-web flexographic print stations in each month never exceeds five weight-percent of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press in that month, including all inboard and outboard stations, and
- (B) The owner or operator maintains records as required in §63.829(f).
- (3) The owner or operator of an affected source, as defined in paragraph (a)(2) of this section, may elect to include in that affected source stand-alone coating equipment subject to the following provisions:

- (i) Stand-alone coating equipment meeting any of the criteria specified in this subparagraph is eligible for inclusion:
- (A) The stand-alone coating equipment and one or more product and packaging rotogravure or wide-web flexographic presses are used to apply solids-containing materials to the same web or substrate, or
- (B) The stand-alone coating equipment and one or more product and packaging rotogravure or wide-web flexographic presses apply a common solids-containing material, or
- (C) A common control device is used to control organic HAP emissions from the stand-alone coating equipment and from one or more product and packaging rotogravure or wide-web flexographic printing presses;
- (ii) All eligible stand-alone coating equipment located at the facility is included in the affected source; and
- (iii) No product and packaging rotogravure or wide-web flexographic presses are excluded from the affected source under the provisions of paragraph (a)(2)(ii) of this section.

§ 63.822 Definitions.

(a) All terms used in this subpart that are not defined below have the meaning given to them in the CAA and in subpart A of this part.

Always-controlled work station means a work station associated with a dryer from which the exhaust is delivered to a control device, with no provision for the dryer exhaust to bypass the control device. Sampling lines for analyzers and relief valves needed for safety purposes are not considered bypass lines.

Capture efficiency means the fraction of all organic HAP emissions generated by a process that are delivered to a control device, expressed as a percentage.

Capture system means a hood, enclosed room, or other means of collecting organic HAP emissions into a closed-vent system that exhausts to a control device.

Car-seal means a seal that is placed on a device that is used to change the position of a valve or damper (e.g., from open to closed) in such a way that the position of the valve or damper cannot be changed without breaking the seal.

Certified product data sheet (CPDS) means documentation furnished by suppliers of inks, coatings, varnishes, adhesives, primers, solvents, and other materials or by an outside laboratory that provides the organic HAP content of these materials, by weight, measured using Method 311 of appendix A of this part 63 or an equivalent or alternative method (or formulation data as provided in §63.827(b)) and the solids content of these materials, by weight, determined in accordance with §63.827(c). The purpose of the CPDS is to assist the owner or operator in demonstrating compliance with the emission limitations presented in §§63.824–63.825.

Coating operation means the application of a uniform layer of material across the entire width of a substrate.

Coating station means a work station on which a coating operation is conducted.

Control device means a device such as a carbon adsorber or oxidizer which reduces the organic HAP in an exhaust gas by recovery or by destruction.

Control device efficiency means the ratio of organic HAP emissions recovered or destroyed by a control device to the total HAP emissions that are introduced into the control device, expressed as a percentage.

Day means a 24-consecutive-hour period.

Facility means all contiguous or adjoining property that is under common ownership or control, including properties that are separated only by a road or other public right-of-way.

Flexographic press means an unwind or feed section, a series of individual work stations, one or more of which is a flexographic print station, any dryers (including interstage dryers and overhead tunnel dryers) associated with the work stations, and a rewind, stack, or collection station. The work stations may be oriented vertically, horizontally, or around the circumference of a single large impression cylinder. Inboard and outboard work stations, including those employing any other technology, such as rotogravure, are included if they are capable of printing or coating on the same substrate.

Flexographic print station means a work station on which a flexographic printing operation is conducted. A flexographic print station includes a flexographic printing plate which is an image carrier made of rubber or other elastomeric material. The image (type and art) to be printed is raised above the printing plate.

HAP applied means the organic HAP content of all inks, coatings, varnishes, adhesives, primers, solvent, and other materials applied to a substrate by a product and packaging rotogravure or wide-web flexographic printing affected source.

HAP used means the organic HAP applied by a publication rotogravure printing affected source, including all organic HAP used for cleaning, parts washing, proof presses, and all organic HAP emitted during tank loading, ink mixing, and storage.

Intermittently-controllable work station means a work station associated with a dryer with provisions for the dryer exhaust to be delivered to or diverted from a control device depending on the position of a valve or damper. Sampling lines for analyzers and relief valves needed for safety purposes are not considered bypass lines.

Month means a calendar month or a prespecified period of 28 days to 35 days.

Never-controlled work station means a work station which is not equipped with provisions by which any emissions, including those in the exhaust from any associated dryer, may be delivered to a control device.

Overall Organic HAP control efficiency means the total efficiency of a control system, determined either by:

- (1) The product of the capture efficiency and the control device efficiency or
- (2) A liquid-liquid material balance.

Print station means a work station on which a printing operation is conducted.

Printing operation means the formation of words, designs, and pictures on a substrate other than fabric through the application of material to that substrate.

Product and packaging rotogravure printing means the production, on a rotogravure press, of any printed substrate not otherwise defined as publication rotogravure printing. This includes, but is not limited to, folding cartons, flexible packaging, labels and wrappers, gift wraps, wall and floor coverings, upholstery, decorative laminates, and tissue products.

Proof press means any device used only to check the quality of the image formation of rotogravure cylinders or flexographic plates, which prints only non-saleable items.

Publication rotogravure printing means the production, on a rotogravure press, of the following saleable paper products:

- (1) Catalogues, including mail order and premium,
- (2) Direct mail advertisements, including circulars, letters, pamphlets, cards, and printed envelopes,
- (3) Display advertisements, including general posters, outdoor advertisements, car cards, window posters; counter and floor displays; point of purchase and other printed display material,
- (4) Magazines,
- (5) Miscellaneous advertisements, including brochures, pamphlets, catalog sheets, circular folders, announcements, package inserts, book jackets, market circulars, magazine inserts, and shopping news,
- (6) Newspapers, magazine and comic supplements for newspapers, and preprinted newspaper inserts, including hi-fi and spectacolor rolls and sections,
- (7) Periodicals, and
- (8) Telephone and other directories, including business reference services.

Research or laboratory equipment means any equipment for which the primary purpose is to conduct research and development into new processes and products, where such equipment is operated under the close supervision of technically trained personnel and is not engaged in the manufacture of products for commercial sale in commerce, except in a de minimis manner.

Rotogravure press means an unwind or feed section, a series of one or more work stations, one or more of which is a rotogravure print station, any dryers associated with the work stations, and

a rewind, stack, or collection section. Inboard and outboard work stations including those employing any other technology, such as flexography, are included if they are capable of printing or coating on the same substrate.

Rotogravure print station means a work station on which a rotogravure printing operation is conducted. A rotogravure print station includes a rotogravure cylinder and ink supply. The image (type and art) to be printed is etched or engraved below the surface of the rotogravure cylinder. On a rotogravure cylinder the printing image consists of millions of minute cells.

Stand-alone coating equipment means an unwind or feed section, a series of one or more coating stations and any associated dryers, and a rewind, stack or collection section that:

Is not part of a product and packaging rotogravure or wide-web flexographic press, and

Is used to conduct one or more coating operations on a substrate. Stand-alone coating equipment

May or may not process substrate that is also processed by a product and packaging rotogravure or wide-web flexographic press, apply solids-containing materials that are also applied by a product and packaging rotogravure or wide-web flexographic press, and utilize a control device that is also utilized by a product and packaging rotogravure or wide-web flexographic press. Stand-alone coating equipment is sometimes referred to as "off-line" coating equipment.

Wide-web flexographic press means a flexographic press capable of printing substrates greater than 18 inches in width.

Work station means a unit on a rotogravure or wide-web flexographic press where material is deposited onto a substrate.

§ 63.823 Standards: General.

Table 1 to this subpart provides cross references to the 40 CFR part 63, subpart A, general provisions, indicating the applicability of the general provisions requirements to this subpart KK.

§ 63.826 Compliance dates.

- (a) The compliance date for an owner or operator of an existing affected source subject to the provisions of this subpart is May 30, 1999.
- (b) The compliance date for an owner or operator of a new affected source subject to the provisions of this subpart is immediately upon start-up of the affected source, or May 30, 1996, whichever is later.
- (c) Affected sources which have undergone reconstruction are subject to the requirements for new affected sources. The costs associated with the purchase and installation of air pollution control equipment are not considered in determining whether the affected source has been

reconstructed. Additionally, the costs of retrofitting and replacement of equipment that is installed specifically to comply with this subpart are not considered reconstruction costs.

§ 63.829 Recordkeeping requirements.

(a) The recordkeeping provisions of 40 CFR part 63 subpart A of this part that apply and those that do not apply to owners and operators of affected sources subject to this subpart are listed in Table 1 of this subpart.

(d) The owner or operator of each facility which commits to the criteria of §63.820(a)(2) shall maintain records of all required measurements and calculations needed to demonstrate compliance with these criteria, including the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis.

§ 63.830 Reporting requirements.

- (a) The reporting provisions of 40 CFR part 63 subpart A of this part that apply and those that do not apply to owners and operators of affected sources subject to this subpart are listed in Table 1 of this subpart.
- (b) Each owner or operator of an affected source subject to this subpart shall submit the reports specified in paragraphs (b)(1) through (b)(6) of this section to the Administrator:
- (1) An initial notification required in §63.9(b).
- (i) Initial notifications for existing sources shall be submitted no later than one year before the compliance date specified in §63.826(a).
- (ii) Initial notifications for new and reconstructed sources shall be submitted as required by §63.9(b).
- (iii) For the purpose of this subpart, a Title V or part 70 permit application may be used in lieu of the initial notification required under §63.9(b), provided the same information is contained in the permit application as required by §63.9(b), and the State to which the permit application has been submitted has an approved operating permit program under part 70 of this chapter and has received delegation of authority from the EPA.
- (iv) Permit applications shall be submitted by the same due dates as those specified for the initial notifications.

§ 63.831 Implementation and enforcement.

- (a) This subpart can be implemented and enforced by the U.S. EPA, or a delegated authority such as the applicable State, local, or Tribal agency. If the U.S. EPA Administrator has delegated authority to a State, local, or Tribal agency, then that agency, in addition to the U.S. EPA, has the authority to implement and enforce this subpart. Contact the applicable U.S. EPA Regional Office to find out if this subpart is delegated to a State, local, or Tribal agency.
- (b) In delegating implementation and enforcement authority of this subpart to a State, local, or Tribal agency under subpart E of this part, the authorities contained in paragraph (c) of this section are retained by the Administrator of U.S. EPA and cannot be transferred to the State, local, or Tribal agency.
- (c) The authorities that cannot be delegated to State, local, or Tribal agencies are as specified in paragraphs (c)(1) through (4) of this section.
- (1) Approval of alternatives to the requirements in §§63.820 through 63.821 and 63.823 through 63.826.
- (2) Approval of alternatives to the test method for organic HAP content determination in §63.827(b) and alternatives to the test method for volatile matter in §63.827(c), and major alternatives to other test methods under §63.7(e)(2)(ii) and (f), as defined in §63.90, and as required in this subpart.
- (3) Approval of major alternatives to monitoring under §63.8(f), as defined in §63.90, and as required in this subpart.
- (4) Approval of major alternatives to recordkeeping and reporting under §63.10(f), as defined in §63.90, and as required in this subpart.

Table 1 to Subpart KK of Part 63—Applicability of General Provisions to Subpart KK

General Provisions Reference	Applicable to subpart KK	Comment
§ 63.1(a)(1)–(a)(4)	Yes.	
§ 63.1(a)(5)	No.	Section reserved.
§ 63.1(a)(6)–(a)(8)	No.	
§ 63.1(a)(9)	No.	Section reserved.
§ 63.1(a)(10)–(a)(14)	Yes.	
§ 63.1(b)(1)	No.	Subpart KK specifies applicability.
§ 63.1(b)(2)–(b)(3)	Yes.	***************************************
§ 63.1(c)(1)	Yes.	
§ 63.1(c)(2)	No.	Area sources are not subject to subpart KK.
§ 63.1(c)(3)	No.	Section reserved.
§ 63.1(c)(4)	Yes.	

Table 1 to Subpart KK of Part 63—Applicability of General Provisions to Subpart KK (continued)

General Provisions Reference	Applicable to subpart KK	Comment
§ 63.1(c)(5)	No.	
§ 63.1(d)	No.	Section reserved.
§ 63.1(e)	Yes.	Section reserved.
§ 63.2	Yes.	Additional definitions in submout VV
		Additional definitions in subpart KK.
§ 63.3(a)–(c)	Yes.	
§ 63.4(a)(1)–(a)(3)	Yes.	C. d'
§ 63.4(a)(4)	No.	Section reserved.
§ 63.4(a)(5)	Yes.	
§ 63.4(b-c)	Yes.	
§ 63.5(a)(1)–(a)(2)	Yes.	
§ 63.5(b)(1)	Yes.	
§ 63.5(b)(2)	No.	Section reserved.
§ 63.5(b)(3)–(b)(6)	Yes.	
§ 63.5(c)	No.	Section reserved.
§ 63.5(d)	Yes.	
§ 63.5(e)	Yes.	
§ 63.5(f)	Yes.	
§ 63.6(a)	Yes.	
§ 63.6(b)(1)–(b)(5)	Yes.	
§ 63.6(b)(6)	No.	Section reserved.
§ 63.6(b)(7)	Yes.	
§ 63.6(c)(1)–(c)(2)	Yes.	
§ 63.6(c)(3)–(c)(4)	No.	Sections reserved.
§ 63.6(c)(5)	Yes.	
§ 63.6(d)	No.	Section reserved.
§ 63.6(e)	Yes.	Provisions pertaining to start-ups, shutdowns, malfunctions, and CMS do not apply unless an add-on control system is used.
§ 63.6(f)	Yes.	do not appry unless an add-on control system is used.
§ 63.6(g)	Yes.	
§ 63.6(h)	No.	Subpart KK does not require COMS.
	Yes.	Subpart KK does not require COMS.
§ 63.6(i)(1)–(i)(14)		Castian managed
§ 63.6(i)(15)	No.	Section reserved.
§ 63.6(i)(16)	Yes.	
§ 63.6(j)	Yes.	
§ 63.7	Yes.	
§ 63.8(a)(1)–(a)(2)	Yes.	
§ 63.8(a)(3)	No.	Section reserved.
§ 63.8(a)(4)	No.	Subpart KK specifies the use of solvent recovery devices or oxidizers.
§ 63.8(b)	Yes.	
§ 63.8(c)(1)–(3)	Yes.	
§ 63.8(c)(4)	No.	Subpart KK specifies CMS sampling requirements.
§ 63.8(c)(5)	No.	Subpart KK does not require COMS.
§ 63.8(c)(6)–(c)(8)	Yes.	Provisions for COMS are not applicable.
§ 63.8(d)–(f)	Yes.	
§ 63.8(g)	No.	Subpart KK specifies CMS data reduction requirements.
§ 63.9(a)	Yes.	
§ 63.9(b)(1)	Yes.	

Table 1 to Subpart KK of Part 63—Applicability of General Provisions to Subpart KK (continued)

General Provisions Reference	Applicable to subpart KK	Comment
§ 63.9(b)(2)	Yes.	Initial notification submission date extended.
§ 63.9(b)(3)–(b)(5)	Yes.	
§ 63.9(c)–(e)	Yes.	
§ 63.9(f)	No.	Subpart KK does not require opacity and visible emissions observations.
§ 63.9(g)	Yes.	Provisions for COMS are not applicable.
§ 63.9(h)(1)–(h)(3)	Yes.	
§ 63.9(h)(4)	No.	Section reserved.
§ 63.9(h)(5)–(h)(6)	Yes.	
§ 63.9(i)	Yes.	
§ 63.9(j)	Yes.	
§ 63.10(a)	Yes.	
§ 63.10(b)(1)–(b)(3)	Yes.	
§ 63.10(c)(1)	Yes.	
§ 63.10(c)(2)–(c)(4)	No.	Sections reserved
§ 63.10(c)(5)–(c)(8)	Yes.	
§ 63.10(c)(9)	No.	Section reserved
§ 63.10(c)(10)–(c)(15)	Yes.	
§ 63.10(d)(1)–(d)(2)	Yes.	
§ 63.10(d)(3)	No.	Subpart KK does not require opacity and visible emissions observations.
§ 63.10(d)(4)–(d)(5)	Yes.	
§ 63.10(e)	Yes.	Provisions for COMS are not applicable.
§ 63.10(f)	Yes.	•
§ 63.11	No.	Subpart KK specifies the use of solvent recovery devices or oxidizers.
§ 63.12	Yes.	
§ 63.13	Yes.	
§ 63.14	Yes.	
§ 63.15	Yes.	

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